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Attorneys for Debtors  
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re</b>	:
	:
<b>MOTORS LIQUIDATION COMPANY, <i>et al.</i>,</b>	:
<b>f/k/a General Motors Corp., <i>et al.</i></b>	:
	:
<b>Debtors.</b>	:
	:
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**Chapter 11 Case No.**  
**09-50026 (REG)**  
**(Jointly Administered)**

**NOTICE OF HEARING ON MOTION OF DEBTORS FOR  
ENTRY OF AN ORDER ESTIMATING MAXIMUM AMOUNT OF  
CERTAIN CLAIMS FOR PURPOSES OF ESTABLISHING CLAIMS RESERVES  
UNDER THE DEBTORS' AMENDED JOINT CHAPTER 11 PLAN**

PLEASE TAKE NOTICE that upon the annexed Motion, dated February 11, 2011 (the “**Motion**”), of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), for an order, pursuant to sections 105(a), 502(c), and 1142(b) of title 11, United States Code (the “**Bankruptcy Code**”), estimating the maximum amount of certain claims for purposes of establishing claims reserves under the Debtors’ Amended Joint Chapter 11 Plan, all as more fully set forth in the Motion, a hearing will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **March 1, 2011 at**

**9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.<sup>1</sup>

PLEASE TAKE FURTHER NOTICE that any responses or objections to this Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 401 South Old Woodward Avenue, Suite 370, Birmingham, Michigan 48009 (Attn: Thomas Morrow); (iii) General Motors LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the

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<sup>1</sup> In the event that no objections to this Motion remain unresolved, the Debtors reserve the right to adjourn the hearing on this Motion to March 3, 2011 and to seek approval of the Disputed Claims Reserve as part of the Confirmation Hearing.

statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. MacLay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.), so as to be received no later than **February 22, 2011, at 4:00 p.m. (Eastern Time)** (the "**Objection Deadline**").

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Motion, the Debtors may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York  
February 11, 2011

/s/ Joseph H. Smolinsky

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SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:
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<b>MOTORS LIQUIDATION COMPANY, <i>et al.</i>,</b>	:
<b>f/k/a General Motors Corp., <i>et al.</i></b>	:
	:
<b>Debtors.</b>	:
	:
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**Chapter 11 Case No.**

**09-50026 (REG)**

**(Jointly Administered)**

**MOTION OF DEBTORS FOR ENTRY OF AN ORDER ESTIMATING MAXIMUM  
AMOUNT OF CERTAIN CLAIMS FOR PURPOSES OF ESTABLISHING CLAIMS  
RESERVES UNDER THE DEBTORS' AMENDED JOINT CHAPTER 11 PLAN**

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TO THE HONORABLE ROBERT E. GERBER,  
UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), respectfully represent:

**Relief Requested**

1. Despite the progress made to date in reconciling the tens of thousands of claims filed in these chapter 11 cases, much work remains. While the Debtors largely have succeeded in causing filers of unliquidated claims to amend their claims to assert liquidated amounts or caps in order to facilitate distributions under the Debtors’ proposed *Amended Joint Chapter 11 Plan* (as may be supplemented, modified, or revised, the “**Plan**”), a number of unliquidated claims remain. In order to make distributions under their proposed plan of liquidation, the Debtors need to set aside sufficient assets to make distributions to these holders of unliquidated claims if and when their claims are Allowed.

2. The claims that are the subject of this Motion are largely liquidated, although each Claim has a placeholder for a possible incremental amount, such as, interest and fees to be determined. At this stage of these chapter 11 cases, without further specificity, an appropriate reserve cannot be established for such incremental amounts. Moreover, these amounts would likely be disallowed as a matter of law and fixing conservative reserves would prejudice other creditors who have asserted fully liquidated claims.

3. By this Motion, the Debtors request entry of an order pursuant to sections 105(a), 502(c), and 1142(b) of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 3021 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), substantially in the form annexed hereto as **Exhibit “A”**, estimating the maximum amount of certain partially unliquidated Claims, or potential Claims, which are not yet Allowed

(collectively, the “**Estimated Claims**” and each person asserting an Estimated Claim, a “**Claimant**”), for reserve purposes under Article VII of the Plan,<sup>2</sup> as set forth on **Exhibits “B”, “C”, “D”, “E”, “F”, “G” and “H”**, annexed hereto, so that the Debtors can make timely distributions under the Plan and effectuate the administration of their Plan without undue delay. The effect of this Motion is to establish a cap on each Estimated Claim.<sup>3</sup>

### **Jurisdiction**

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **The Claims Process**

5. On September 15, 2009, the Debtors filed their respective schedules of assets and liabilities and statements of financial affairs (as amended, the “**Schedules**”). By order dated September 16, 2009 (ECF No. 4079) (the “**Initial Debtors’ Bar Date Order**”), the Bankruptcy Court established November 30, 2009 as the bar date for creditors to file proofs of Claim asserting prepetition liabilities against the Initial Debtors<sup>4</sup> (the “**Initial Debtors’ Bar Date**”). By order dated December 18, 2009 (ECF No. 4681) (the “**Property Bar Date Order**”), the Bankruptcy Court established February 10, 2010 as the deadline for entities residing adjacent

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Plan. A copy of the Plan and related Disclosure Statement can be found at [www.motorsliquidationdocket.com](http://www.motorsliquidationdocket.com).

<sup>3</sup> By this Motion, the Debtors are not seeking to estimate any portion of the environmental claims subject to the Environmental Response Trust under Section 6.4 of the Plan.

<sup>4</sup> “Initial Debtors” refers to the four entities that filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code on June 1, 2009:

- Motors Liquidation Company (f/k/a General Motors Corporation)
- MLCS, LLC (f/k/a Saturn, LLC)
- MLC Distribution Corporation (f/k/a Saturn Distribution Corporation)
- MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.)

to or in the proximity of certain Initial Debtors' properties to file a proof of Claim with respect to damages to their person or real property (the "**Property Bar Date**"). By order dated December 2, 2009 (ECF No. 4586) (the "**REALM/ENCORE Bar Date Order**," and together with the Initial Debtors' Bar Date Order and the Property Bar Date Order, the "**Bar Date Orders**"), the Bankruptcy Court established February 1, 2010 as the deadline for each person or entity to file a proof of Claim against Debtors Remediation and Liability Management Company, Inc. ("**REALM**") and Environmental Corporate Remediation Company, Inc. ("**ENCORE**") and April 16, 2010 as the deadline for governmental units to file a proof of Claim against REALM and ENCORE (the "**REALM/ENCORE Bar Dates**," and together with the Initial Debtors' Bar Date and the Property Bar Date, the "**Bar Dates**").

6. The Plan also establishes the bar date for filing proofs of Claim for damages arising from the rejection of executory contracts and unexpired leases as the date that is thirty (30) days after the Confirmation Date, as defined in the Plan (the "**Rejection Damages Bar Date**").

7. The Debtors provided notice of the Bar Dates to all known creditors and potential creditors in accordance with the requirements of the Bar Date Orders. To date, more than 78,000 proofs of Claim have been filed in these cases (collectively, the "**Filed Claims**") in addition to claims identified in the Schedules (the "**Scheduled Claims**").

8. The Debtors have made every effort to expedite the claims resolution process. The Debtors have reviewed and reconciled claims and pursued the resolution of claims through (a) prosecuting over 209 omnibus claims objections with respect to approximately 37,700 claims; (b) pursuing claims settlements; (c) pursuing claims resolutions under the Court-

approved alternative dispute resolution procedures (the “**ADR Program**”); and (d) reconciling and allowing claims consistent with the Debtors’ books and records.

9. The Debtors’ actions to date have resulted in a reduction in claims from approximately \$274 billion to less than \$50 billion. Claims have also been reclassified where they improperly asserted either secured, administrative, and/or priority claims.

10. The statutory committee of unsecured creditors appointed by the U.S. Trustee in these chapter 11 cases (the “**Creditors’ Committee**”) has been directly involved in the Debtors’ Claims resolution process. Since the Claims resolution process began, the Debtors have provided the Creditors’ Committee with detailed information regarding Claims and the Debtors’ efforts in pursuing the resolution of Claims. The Debtors have sought Creditors’ Committee consent to any material Claims settlements, and the Creditors’ Committee has received all notices of Claims settlements provided for under the Claims Settlement Procedures. In addition, the Debtors have consulted with the Creditors’ Committee on any Claims where the Debtors have pursued resolution through the ADR Program.

11. Despite the Debtors’ intense efforts in the Claims resolution process and their considerable success in addressing and resolving thousands of Claims, there remain potential unliquidated claims in Class 3 of the Plan (General Unsecured Claims) that are yet to be resolved. With respect to unliquidated claims, the Debtors have made written requests to the entities filing such claims to liquidate the claims or provide a cap for reserve purposes. The efforts have been reasonably successful. Nonetheless, as of the date of this Motion, the Debtors estimate that there remain approximately 2,050 unliquidated (in whole or in part) General Unsecured Claims that may fall within Class 3, 1,300 of which are subject to pending formal objections. By this Motion, the Debtors seek to estimate approximately 530 partially

unliquidated Claims, 235 of which are subject to pending formal objections.<sup>5</sup> As of the Effective Date, the Debtors anticipate there will be approximately 150 partially unliquidated claims remaining. None of the Estimated Claims relate to personal injury tort or wrongful death claims against the estates. Therefore, this Motion is proper under 28 U.S.C. § 157(b)(2).

### **The Plan and Distributions Under the Plan**

12. On December 7, 2010, the Debtors filed the Plan (ECF No. 8015), and on December 8, 2010, the Debtors filed their disclosure statement in respect of the Plan (the “**Disclosure Statement**”) (ECF No. 8023). On December 8, 2010, this Court entered an order approving the Disclosure Statement (ECF. No. 8043) and related solicitation procedures. Solicitation of votes on the Plan is currently underway. A hearing on confirmation of the Plan is currently scheduled to begin on March 3, 2011 (the “**Confirmation Hearing**”).<sup>6</sup>

13. Section 7.3 of the Plan provides that “the Debtors or the GUC Trust Administrator, as applicable, may at any time request that the Bankruptcy Court estimate any contingent, unliquidated or Disputed Claim pursuant to Section 502(c) of the Bankruptcy Code.”

14. Section 6.2 of the Plan provides for the establishment of the GUC Trust “to administer certain post-Effective Date responsibilities under the Plan, including, but not limited to, distributing New GM Securities and resolving outstanding Disputed General

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<sup>5</sup> The Debtors believe that the remaining fully unliquidated claims are resolved through the Motion of the Debtors for Entry of an Order Establishing Claims Reserves with Respect to, Among Other Things, Certain Unliquidated Claims in Connection with Distributions to be Made Under the Debtors’ Amended Joint Chapter 11 Plan [ECF No. 9212] (the “**Fully Unliquidated Claims Reserve Motion**”) being filed concurrently herewith. The Debtors believe that all of the partially unliquidated Claims are included on the annexed Exhibits “B” through “H.” If any partially unliquidated Claims were inadvertently omitted from Exhibits “B” through “H”, the unliquidated amount of such Claim will be subject to the Fully Unliquidated Claims Reserve as set forth in the Fully Unliquidated Claims Reserve Motion.

<sup>6</sup> In the event that no objections to this Motion remain unresolved, the Debtors reserve the right to adjourn the hearing on this Motion to March 3, 2011 and to seek approval of the Disputed Claims Reserve as part of the Confirmation Hearing.

Unsecured Claims to determine the amount of Allowed General Unsecured Claims that will be eligible for distribution of their Pro Rata Share of New GM Securities under the Plan.”

15. The Plan provides for distributions from the GUC Trust to be made on account of Claims that are Allowed Claims. General Unsecured Claims against the Debtors are classified in Class 3 under the Plan. Section 4.3 of the Plan provides for the following distribution to each holder of an Allowed General Unsecured Claim in Class 3:

(a) As soon as reasonably practicable after the Effective Date (but not earlier than the first Business Day following the Distribution Record Date), each holder of an Allowed General Unsecured Claim as of the Distribution Record Date shall receive from the GUC Trust its Pro Rata Share of (i) the New GM Securities or the proceeds thereof, if any, and (ii) the GUC Trust Units, in accordance with the terms of the GUC Trust and the GUC Trust Agreement.”

Section 4.3 of the Plan further provides that “The GUC Trust shall make subsequent distributions of New GM Securities and GUC Trust Units to holders of Disputed General Unsecured Claims as of the Distribution Record Date whose Claims are subsequently Allowed.” The amount of New GM Securities available for distribution for potential Class 3 Claims under the Plan is fixed. No additional New GM Securities or GUC Trust Units will be issued on account of holders of Class 3 Claims.

16. Section 1.112 of the Plan sets forth the calculation of the Pro Rata Share for distribution purposes and defines “Pro Rata Share” as “the ratio (expressed as a percentage) of (i) the amount of any Allowed Claim in a particular Class to (ii) the sum of (x) the aggregate amount of Allowed Claims in such Class and (y) the aggregate amount of Disputed Claims in such Class.” Section 1.112 of the Plan contemplates the creation of reserves for Disputed Claims for purposes of calculating the Pro Rata distribution: “The Debtors may seek a determination by

the Bankruptcy Court of the amount that should be reserved in determining the Pro Rata Share on account of Disputed Claims on an individual or aggregate basis.”

17. Article VII of the Plan sets forth the “Procedures for Disputed Claims,”<sup>7</sup> and Section 7.2 of the Plan provides that “if any portion of a Claim is a Disputed Claim, no payment or distribution provided hereunder to the holder thereof shall be made on account of such Claim unless and until such Disputed Claim becomes an Allowed Claim.” Section 7.2 of the Plan specifies that until such time as a Disputed Unsecured Claim is Allowed, such property shall be held in the GUC Trust or the Avoidance Action Trust Claims Reserve, as applicable. Additionally, pursuant to Section 5.5 of the GUC Trust Agreement<sup>8</sup> the GUC Trust Administrator

shall at all times, to the extent practicable, retain (a) sufficient GUC Trust Distributable Assets as the GUC Trust Administrator shall determine, in consultation with the GUC Trust Monitor and subject to the Budget, as would be distributable (I) to all holders of Disputed General Unsecured Claims at the time outstanding as if all Disputed General Unsecured Claims were allowed at the Maximum Amount, but only until such Disputed General Unsecured Claims are resolved . . .

The GUC Trust Agreement further provides that the “Maximum Amount” means:

with respect to any Disputed General Unsecured Claim, (x) the amount agreed to by the Debtors and/or the GUC Trust Administrator and the holder of such claim (which shall include any agreed capped amount pursuant to the ADR Procedures approved by the Bankruptcy Court; (y) the amount, if any, estimated or determined by the Bankruptcy Court in accordance with Bankruptcy Code Section 502(c); or (z) absent any such agreement, estimation or determination, the liquidated amount set forth in the proof of claim filed by the holder of such claim, or in the case of unliquidated claims, the amount estimated by the Debtors and/or the GUC Trust Administrator.

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<sup>7</sup> See Section 1.54 of the Plan for the definition of “Disputed.”

<sup>8</sup> The GUC Trust Agreement is annexed as Exhibit “D” to the Plan.

Accordingly, the GUC Trust Administrator is required to set aside a certain reserve amount for Disputed Claims prior to making any distributions under the Plan. The Debtors are filing this Motion consistent with these provisions of the Plan and the GUC Trust Agreement.

18. Due in part to the nature of the Estimated Claims, the Debtors do not anticipate that they will be able to reach a resolution on each of the Estimated Claims in an expeditious manner or, in any event, prior to the Effective Date. In order to properly calculate the Pro Rata distribution for each Allowed General Unsecured Claim and make distributions prior to the resolution of each of the Estimated Claims, the Debtors request that the Court estimate the maximum amount of the Estimated Claims in order to establish sufficient reserves to provide for the Estimated Claims that are not currently Allowed, but could become Allowed in the future.

#### **The Estimated Claims**

19. By this Motion, the Debtors seek to estimate approximately 530 Claims that are largely liquidated (the “**Liquidated Amount**”) but also include additional potential claim amounts that are unliquidated (such as additional fees, costs, or interest) (the “**Unliquidated Amounts**”). The Debtors believe that the Unliquidated Amounts in the Estimated Claims, in many cases, are speculative and protective in nature. For example, it appears that, for many of these Claims, a short reference to the possibility of additional amounts has been added to the proof of claim simply as a means for the Claimant to later seek amounts that were not identified in the Claim as filed. Such a reservation of rights (particularly one year or more after the Bar Dates) is not an indicator of actual amounts owed. Other Estimated Claims reserve for the possibility of additional amounts that are inappropriate, such as the ongoing accrual of interest that is prohibited under section 502(b)(2) of the Bankruptcy Code.

20. Based on their review of the Estimated Claims, the Debtors propose to estimate the maximum amount of the Unliquidated Amounts for reserve purposes under the Plan at \$0, and the Debtors intend to utilize the Liquidated Amount of each Estimated Claim for reserve purposes under the Plan. Therefore, the Debtors propose to set the maximum amount of each Estimated Claim for reserve purposes under the Plan as the Liquidated Amount of such Estimated Claim. Of course, the Debtors are prepared to address timely responses to this Motion in the event a Claimant can assert a reasonable, additional fixed increment to their Liquidated Amount.

**Basis for Relief Requested**

21. Section 502(c) of the Bankruptcy Code provides for the estimation of contingent or unliquidated claims:

(c) There shall be estimated for purposes of allowance under this section –

(1) any contingent or unliquidated claim, the fixing or liquidation of which, as the case may be, would unduly delay the administration of the case; or

(2) any right to payment arising from a right to an equitable remedy for breach of performance.

11 U.S.C. § 502(c).

22. Although section 502(c) refers to the estimation of claims for allowance purposes, courts have estimated claims in order to set reserves for plan distributions. *See, e.g., In re Lomas Fin. Corp.*, 172 B.R. 3, 4 (S.D.N.Y. 1994) (noting that the court had estimated certain claims to set up a reserve and cap the recovery of the claims); *In re Adelphia Commc'ns Corp.*, 368 B.R. 140, 279 (Bankr. S.D.N.Y. 2007) (estimating a creditor's claim for future expenses for purposes of establishing a reserve); *In re Enron Corp.*, No 01-16034, 2006 WL 544463 (Bankr. S.D.N.Y. Jan. 17, 2006) (approving the debtor's motion to estimate claims for purposes of

establishing reserves and setting the reserve amount as the maximum amount of recovery); *In re Thomson McKinnon Sec., Inc.*, 143 B.R. 612, 619 (Bankr. S.D.N.Y. 1992) (“The estimation process is an expedient method for setting the amount of a claim that may receive a distributive share from the estate”).

23. Further, courts have recognized the ability to estimate disputed claims under section 502(c). *See In re Wallace’s Bookstores, Inc.*, 317 B.R. 720, 724 (Bankr. E.D. Ky. 2004) (holding that a liquidating supervisor had the right under section 502(c) to seek estimation of disputed claims pursuant to a plan of reorganization); *In re Adelphia Bus. Solutions, Inc.*, 341 B.R. 415, 422-23 (Bankr. S.D.N.Y. 2003) (estimating the disputed unliquidated amount of an administrative claim under section 502(c)).

24. The clearly stated purpose of allowing for estimation of claims is “to avoid undue delay in the administration of bankruptcy proceedings.” *Frito-Lay, Inc. v. LTV Steel Co. (In re Chateaugay Corp.)*, 10 F.3d 944, 957 (2d Cir. 1993). As such, bankruptcy courts may estimate claims under section 502(c)(1) of the Bankruptcy Code in order: “1) [t]o avoid the need to await the resolution of outside lawsuits to determine issues of liability or amount owed by means of anticipating and estimating the likely outcome of these actions, and 2) . . . to promote a fair distribution to creditors through a realistic assessment of uncertain claims.” *O’Neill v. Cont’l Airlines, Inc. (In re Cont’l Airlines, Inc.)*, 981 F.2d 1450, 1461 (5th Cir. 1993). In addition, estimation of a claim under section 502(c)(1) is appropriate if liquidation of a claim “will take too long and unduly delay the distribution of the estate’s assets.” *In re N.Y. Med. Group, P.C.*, 265 B.R. 408, 415 (Bankr. S.D.N.Y. 2001). Moreover, section 502(c) uses the word “shall,” and, therefore, estimation is mandatory rather than permissive if the criteria of section 502(c) are met. *See, e.g., Int’l Bhd. of Teamsters v. IML Freight, Inc.*, 789 F.2d 1460,

1463 (10th Cir. 1986); *In re Frontier Airlines, Inc.*, 137 B.R. 811, 814 (D. Colo. 1992); *In re Lane*, 68 B.R. 609, 611 (Bankr. D. Haw. 1986); *In re The Nova Real Estate Inv.*, 23 B.R. 62, 65 (Bankr. E.D. Va. 1982).

25. The Debtors respectfully submit that both factors supporting the estimation of claims pursuant to section 502(c)(1) are present here: (a) it would take a long time to commence or continue prosecution of objections to each of the Estimated Claims; and (b) waiting for the liquidation of the Estimated Claims will unduly delay the administration of the Debtors' estates. The Estimated Claims include the following categories of claims, as set forth on Exhibits "B" through "H": (1) employee-related claims (the "**Employee-Related Claims**"), (2) environmental claims (the "**Environmental Claims**"), (3) claims based upon executory contracts (the "**Executory Contracts Claims**"), (4) debt-related claims (the "**Debt Claims**"), (5) litigation-related claims (the "**Litigation Claims**"), (6) claims made by equity security holders (the "**Equity Security Holders Claims**") and (6) miscellaneous claims that were asserted on either a partially unliquidated or contingent basis (the "**Other Claims**"). As indicated in Exhibits "B" through "H," certain of the Estimated Claims have been the subject of previous omnibus claims objections.

26. Litigating each Estimated Claim to conclusion would unduly delay the administration of these estates. As of the date of this Motion, the stakeholders in these cases have waited nearly two years for the completion of these cases and any additional delay would deprive them of their distributions under the Plan.

27. It is not possible for courts to estimate the value of claims with absolute certainty; thus, estimation requires only "sufficient evidence on which to base a *reasonable estimate* of the claim." *Bittner v. Borne Chem. Co.*, 691 F.2d 134, 135 (3d Cir. 1982) (emphasis

added); *see also In re Windsor Plumbing Supply Co.*, 170 B.R. 503, 521 (Bankr. E.D.N.Y. 1994) (advocating use of probabilities in estimation of claims). The principal consideration when estimating the value of a claim is “to promote a fair distribution to creditors through a realistic assessment of uncertain claims.” *Cont’l Airlines*, 981 F.2d at 1461; *see also In re Enron Corp.*, Ch. 11 Case No. 01-16034, 2006 WL 544463, at \*4 (Bankr. S.D.N.Y. Jan. 17, 2006) (“[T]he estimation of claims promotes the purpose of establishing the amount of claims that are to receive distributive shares”) (citing *In re Thomson McKinnon Sec., Inc.*, 143 B.R. at 619).

28. Section 502(c) does not prescribe the method for estimating a claim, and the Court therefore has discretion to select the valuation model that best suits the circumstances of the case at hand when estimating the value of claims. “[W]hen estimating claims, bankruptcy courts may use whatever method is best suited to the contingencies of the case, so long as the procedure is consistent with the fundamental policy of Chapter 11 that a reorganization must be accomplished quickly and efficiently.” *Adelphia Commc’ns*, 368 B.R. at 278.

29. In addition, the Court has broad authority under sections 1142(b) and 105(a) of the Bankruptcy Code over the property of the estate administered under the Plan and to issue any order necessary to implement the provisions of the Plan and the Bankruptcy Code. *See* 11 U.S.C. § 1142(b) (“The court may direct the debtor and any other necessary party to execute or deliver or to join in the execution or delivery of any instrument required to effect a transfer of property dealt with by a confirmed plan, and to perform any other act . . . that is necessary to the consummation of the plan”); *id.* § 105(a) (“The court may issue any order, process or judgment that is necessary or appropriate to carry out the provisions of this title.”); *see also Hosp. & Univ. Prop. Damage Claimants v. Johns-Manville Corp. (In re Johns-Manville Corp.)*, 7 F.3d 32, 34 (2d Cir. 1993) (finding that bankruptcy courts retain postconfirmation jurisdiction to the extent

provided by the plan); *In re Oversight & Control Comm'n of Avanzit, S.A.*, 385 B.R. 525, 535 (Bankr. S.D.N.Y. 2008) (“The bankruptcy court retains jurisdiction under 11 U.S.C. § 1142(b) . . . and it has ‘continuing responsibilities to satisfy itself that the [p]lan is being properly implemented.’”) (internal citations omitted).

30. The Debtors arrived at their estimates for the unliquidated Disputed Claims in good faith, conservatively, and based upon appropriate review and analysis. The Debtors and their professionals have proffered estimations based on a comprehensive review of (a) the proofs of claims themselves and supporting documentation, (b) the Debtors’ books and records, (c) communications, if any, with the holders of the Estimated Claims; (d) the Debtors’ historical experience with similar Claims (both prior to and during these cases); (e) the legal issues, if any, associated with the Claims; and (f) such other factors as the Debtors deemed relevant. Accordingly, the Debtors’ estimate the unliquidated portion of each Estimated Claim at what the Debtors believe is the maximum possible amount. This represents the fairest possible course to protect the interests of all creditors, including unliquidated creditors, while allowing for the expedient administration of these cases.

31. Additionally, during the course of these chapter 11 cases, as noted above, the Debtors have expunged or reduced in amount more than 23,721 Claims, resulting in a reduction of more than \$180 billion in asserted claims, and have resolved or will resolve more than \$74.4 billion in Claims through various entered or pending settlement agreements and the Plan. This effort demonstrates the Debtors’ ability to properly and accurately estimate the Estimated Claims. Accordingly, the Court can and should rely upon the Debtors’ estimate of the maximum Allowed amount of the Estimated Claims for reserve purposes under the Plan.

32. Furthermore, estimation of a claim does not preclude the Debtors from continuing to dispute the validity of the remainder of the claim (which remains a Disputed Claim), but rather, ensures that, if the claim becomes an Allowed Claim, its amount for Plan purposes will not in any event exceed the estimated amount set forth on Exhibits “B” through “H.” In addition, the relief requested in this Motion is only requested in connection with the confirmation of the Plan and the effectiveness of the relief requested is contingent on the results of the confirmation hearing, currently scheduled to begin on March 3, 2011. In the event that the Plan is not confirmed, the Debtors request that the Court deem any relief granted on this Motion void and, if the Estimated Claims are not otherwise resolved, the Debtors will seek the relief requested at the appropriate time.

33. For the reasons set forth in this Motion, the Debtors hereby request that the Court enter the Proposed Order annexed hereto, approving the maximum amounts of the Estimated Claims set forth on Exhibits “B” through “H.” The Debtors submit that the Plan contemplates this estimation procedure and that the relief requested by the Debtors is consistent with section 502(c) of the Bankruptcy Code. Upon confirmation of the Plan, the Debtors submit that it is unfair to the remaining creditors to require them to wait for the outcome of determining the allowed amounts of the Estimated Claims, which likely will take significant time due to the nature of the claims and the underlying litigations, before making amounts available for distribution under the Plan. The relief requested herein will allow the Debtors to effectuate timely distributions under the Plan, without undue delay.

34. To be clear, the Debtors are not intending to allow the Estimated Claims at the capped amount and reserve all rights to further object to the Estimated Claims on any basis whatsoever.

**Notice**

35. Notice of this Motion has been provided to (a) the holders of the Estimated Claims set forth on Exhibits “B” through “H” hereto; and (b) parties in interest in accordance with the Fifth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated January 3, 2011 (ECF No. 8360). The Debtors submit that such notice is sufficient and no other or further notice need be provided.

36. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: New York, New York  
February 11, 2011

/s/ Joseph H. Smolinsky

Harvey R. Miller  
Stephen Karotkin  
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
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Facsimile: (212) 310-8007

Attorneys for Debtors  
and Debtors in Possession

**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
In re	:
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	:
	:
-----X	

**Chapter 11 Case No.**  
**09-50026 (REG)**  
**(Jointly Administered)**

**ORDER ESTIMATING MAXIMUM AMOUNT OF CERTAIN CLAIMS FOR  
PURPOSES OF ESTABLISHING CLAIMS RESERVES UNDER  
THE DEBTORS' AMENDED JOINT CHAPTER 11 PLAN**

Upon the Motion, dated February 11, 2011 (the “**Motion**”),<sup>1</sup> of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), pursuant to section[s] 105(a), 502(c), and 1142(b) of title 11, United States Code (the “**Bankruptcy Code**”), for entry of an order estimating the maximum amount of certain partially unliquidated Claims, or potential Claims, which are not yet Allowed (collectively, the “**Estimated Claims**”), for reserve purposes under Article VII of the Debtors’ proposed Amended Joint Chapter 11 Plan (the “**Plan**”), in or, all as more fully described in the Motion; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Motion is granted as provided herein; and it is further

ORDERED that the Estimated Claims identified on **Exhibit 1** annexed hereto are hereby estimated in the maximum amounts set forth thereon for purposes of determining the reserves to be set for these claims under the Plan; and it is further

ORDERED that the estimated amounts set forth for each Estimated Claim listed on **Exhibit 1** are the maximum amounts for which the Estimated Claims can be allowed in the bankruptcy proceeding regardless of the outcome of any pending objection or defense to the claim, state or federal court litigation, or other proceeding; and it is further

ORDERED that the estimation of the Estimated Claims is not deemed to establish the maximum allowed amount of any such Estimated Claim for any purpose unrelated to determining the distributions to be made pursuant to the Plan and maintaining reserves therefore; and it is further

ORDERED that the estimation of the Estimated Claims is without prejudice to the rights, defenses and objections of the Debtors to the merits of the Estimated Claims and that by estimating the Estimated Claims, the Debtors and this Court are not making a determination that the Debtors or the Debtors' estate are liable on account of the Estimated Claims in any amount; and it is further

ORDERED that the rights of the Debtors and the GUC Trust Administrator to object to, and defend against, the Estimated Claims are fully preserved; and it is further

ORDERED that the estimation of the Estimated Claims is without prejudice to the Debtors' ability to seek relief from the Court to disallow any Estimated Claim or to fix the

allowed amount of any Estimated Claim in accordance with the Plan and the Bankruptcy Code in an amount less than or equal to the estimated amounts set forth on **Exhibit 1**, however, in no event shall the allowed amount of any Estimated Claim exceed the estimated amount set forth on **Exhibit 1** for such Estimated Claim for purposes of distributions or reserves under the Plan; and it is further

ORDERED that the Estimated Claims are “Disputed Claims” under the Plan and shall remain so unless and until they are disallowed or become “Allowed Claims” under the Plan; and it is further

ORDERED that the relief granted in this Order is contingent on confirmation of the Plan, and in the event the Plan is not confirmed, any relief granted in this Order shall be deemed void; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
[\_\_\_\_], 2011

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Honorable Robert E. Gerber  
United States Bankruptcy Judge

**EXHIBIT B**

**ENVIRONMENTAL CLAIMS**

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
ASHLAND INC C/O DAVID L RIESER 77 WEST WACKER DRIVE SUITE 4100 CHICAGO, IL 60601	66746	Motors Liquidation Company	\$2,570,001.05	Partially Unliquidated claims	<i>Under Objection</i>
BASF CORPORATION ATTN: DAVID P SCHNEIDER ESQ BRESSLER AMERY & ROSS PC PO BOX 1980 MORRISTOWN, NJ 07962	59198	Motors Liquidation Company	\$20,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BASF CORPORATION C/O BRESSLER AMERY & ROSS PC ATTN DAVID P SCHNEIDER ESQ PO BOX 1980 MORRISTOWN, NJ 07962	69934	Remediation And Liability Management Company, Inc.	\$4,800,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BAY AREA DRUM AD HOC PRP GROUP C/O NICHOLAS W VAN AELSTYN BEVERIDGE DIAMOND PC 456 MONTGOMERY STREET STE 1800 SAN FRANCISCO, CA 94104	59974	Motors Liquidation Company	\$30,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BKK JOINT DEFENSE GROUP C/O JAMES J. DRAGNA BINGHAM MCCUTCHEN LLP 355 SOUTH GRAND AVENUE, SUITE 4400 LOS ANGELES, CA 90071	36709	Motors Liquidation Company	\$35,000,000.00	Partially Unliquidated claims	<i>Under Objection</i>
BOARD OF COUNTY COMMISSIONERS LUCAS CO OH ONE GOVERNMENT CENTER SUITE 800 TOLEDO, OH 43604 UNITED STATES OF AMERICA	29620	Motors Liquidation Company	\$19,641,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BORG WARNER INC ATTN THOMAS D LUPO WILLIAMS MONTGOMERY & JOHN LTD 233 S WACKER DR SUITE 6100 CHICAGO, IL 60606	16557	Motors Liquidation Company	\$1,200,000.00	Partially Unliquidated claims	<i>Under Objection</i>
BRISTOL CENTER LLC BLDG MANAGEMENT CO INC ATTN DONALD OLENICK 417 FIFTH AVE 4TH FL NEW YORK, NY 10016	59748	Motors Liquidation Company	\$5,025,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
BROWNING-FERRIS INDUSTRIES OF OHIO INC ATTN: STEPHEN K DEXTER LATHROP & GAGE LLP 370 17TH ST STE 4650 DENVER, CO 80202	59199	Motors Liquidation Company	\$99,666.67	Partially Unliquidated claims	<i>Under Objection</i>
CARGILL, INCORPORATED CARGILL, INCORPORATED C/O MARK ERZEN KARAGANIS WHITE & MAGEL LTD 1 N WACKER DR STE 4400 CHICAGO, IL 60606	63800	Motors Liquidation Company	\$3,905,462.00	Partially Unliquidated claims	<i>Under Objection</i>
CASMALIA RESOURCES SITE STEERING COMMITTEE C/O MELISSA MURRAY ESQ, BINGHAM MCCUTCHEN LLP 2020 K STREET NW WASHINGTON, DC 20006	51380	Motors Liquidation Company	\$106,900,000.00	Partially Unliquidated claims	<i>Under Objection</i>
CENTERPOINT PROP TRUST, AS CORP SUCCESSOR TO CENTERPOINT PROP CORP & CENTERPOINT REALTY SERVICES COR J MARK FISHER / JASON M TORF SCHIFF HARDIN LLP 233 S WACKER DR SUITE 6600 CHICAGO, IL 60606	69382	Motors Liquidation Company	\$13,514,975.34	Partially Unliquidated claims	<i>Remaining Claim</i>
CHEMCLENE SITE DEFENSE GROUP C/O LANGSAM STEVENS & MORRIS 1616 WALNUT ST STE 612 PHILADELPHIA, PA 19103	59696	Motors Liquidation Company	\$401,983.50	Partially Unliquidated claims	<i>Under Objection</i>
CITY OF LIVONIA MICHIGAN DEPARTMENT OF LAW 33000 CIVIC CENTER DR LIVONIA, MI 48154	59021	Motors Liquidation Company	\$10,769,541.00	Partially Unliquidated claims	<i>Remaining Claim</i>
COLONIAL PIPELINE COMPANY GENERAL COUNSEL'S OFFICE 1185 SANCTUARY PARKWAY, SUITE 100 ALPHARETTA, GA 30009	66208	Motors Liquidation Company	\$4,800,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
D. A. STUART COMPANY C/O EUGENE CARLINE HOUGHTON INTERNATIONAL MADISON & VAN BUREN AVE. PO BOX 930 VALLEY FORGE, PA 19482 UNITED STATES OF AMERICA	26797	Motors Liquidation Company	\$84,300.00	Partially Unliquidated claims	<i>Remaining Claim</i>

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
DEKALB COUNTY C/O GEORGE F SANDERSON III ELLIS & WINTERS LLP PO BOX 33550 RALEIGH, NC 27636	59083	Motors Liquidation Company	\$689,933.07	Partially Unliquidated claims	<i>Remaining Claim</i>
DUANE MARINE STEERING COMMITTEE (ON BEHALF OF DUANE MARINE PRP GROUP) C/O NORMAN W BERSTEIN ESQ NW BERNSTEIN & ASSOCIATES LLC 800 WESTCHESTER AVE N319 RYE BROOK, NY 10573	59686	Motors Liquidation Company	\$35,126.07	Partially Unliquidated claims	<i>Remaining Claim</i>
EDGEWATER SITE ADMINISTRATIVE GROUP ATTN PAUL G MCCUSKER ESQ C/O MCCUSKER ANSELM ROSEN AND CARVELLI 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932	58621	Motors Liquidation Company	\$4,800,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
EXXON MOBIL CORPORATION ANDREW E ANSELM ESQ MCCUSKER ANSELM ROSEN AND CARVELLI PC 210 PARK AVENUE STE 301 PO BOX 240 FLORHAM PARK, NJ 07932	59637	Motors Liquidation Company	\$20,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
EXXON MOBIL CORPORATION ATTN PAUL G MCCUSKER ESQ MCCUSKER ANSELM ROSEN & CARVELLI 210 PARK AVENUE STE 301 PO BOX 240 FLORHAM PARK, NJ 07932	59857	Motors Liquidation Company	\$4,800,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
GENERAL DYNAMICS CORPORATION NORMAN W BERNSTEIN ESQ N.W. BERNSTEIN & ASSOCIATES LLC 800 WESTCHESTER AVENUE STE N319 RYE BROOK, NY 10573	48440	Motors Liquidation Company	\$20,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
GENERAL DYNAMICS LAND SYSTEMS INC MCCARTER & ENGLISH LLP ATTN ROBERT J HOELSCHER PARTNER 1735 MARKET STREET SUITE 700 PHILADELPHIA, PA 19103 UNITED STATES OF AMERICA	44294	Motors Liquidation Company	\$4,800,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
GENERAL ELECTRIC COMPANY C/O EHS COUNSEL APPLIANCE PARK, AP2-225 LOUISVILLE, KY 40225 UNITED STATES OF AMERICA	44837	Motors Liquidation Company	\$1,017,000.00	Partially Unliquidated claims	<i>Under Objection</i>
GEORGIA WASTE SYSTEMS, INC C/O GEORGE F SANDERSON III ELLIS & WINTERS LLP PO BOX 33550 RALEIGH, NC 27636	59080	Motors Liquidation Company	\$258,804.68	Partially Unliquidated claims	<i>Remaining Claim</i>
GOODRICH CORPORATION C/O POLYONE CORP ATTN: RICHARD E HAHN, ASST SEC 33587 WALKER ROAD AVON LAKE, OH 44012	59065	Motors Liquidation Company	\$119,384.06	Partially Unliquidated claims	<i>Under Objection</i>
HOBART CORPORATION KRISTIN B MAYHEW POPE & HAZARD LLP 30 JEILIFF LANE SOUTHPORT, CT 06890	59841	Motors Liquidation Company	\$3,300,000.00	Partially Unliquidated claims	<i>Under Objection</i>
HOLLIDAY REMEDIATION TASK FORCE LISA A EPPS & JAMES T. PRICE SPENCER FANE BRITT & BROWNE LLP C/O DOEPKE-HOLLIDAY SUPERFUND SITE 1000 WALNUT ST STE 1400 KANSAS CITY, MO 64106	45843	Motors Liquidation Company	\$3,341,600.00	Partially Unliquidated claims	<i>Under Objection</i>
HONEYWELL INTERNATIONAL INC ATTN THOMAS BYRNE CHIEF ENVIRONMENTAL COUNSEL 101 COLUMBIA ROAD MORRISTOWN, NJ 07962	46498	Motors Liquidation Company	\$20,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
HONEYWELL INTERNATIONAL INC. ATTN THOMAS BYRNE CHIEF ENVIRONMENTAL COUNSEL 101 COLUMBIA ROAD MORRISTOWN, NJ 07962 UNITED STATES OF AMERICA	45831	Motors Liquidation Company	\$84,300.00	Partially Unliquidated claims	<i>Remaining Claim</i>
ILCO SITE REMEDIATION GROUP C/O DONALD WORKMAN & CHRISTOPHER GIAIMO BAKER & HOSTETLER, LLP 1050 CONNECTICUT AVE., STE 1100 WASHINGTON, DC 20036	18029	Motors Liquidation Company	\$5,096,773.48	Partially Unliquidated claims	<i>Remaining Claim</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY JAMES L MORGAN, ASSISTANT ATTORNEY GENERAL ENVIRONMENTAL BUREAU 500 SOUTH SECOND STREET SPRINGFIELD, IL 62706	44875	Motors Liquidation Company	\$3,100,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
ILLINOIS TOOL WORKS INC KRISTIN B MAYHEW POPE & HAZARD LLP 30 JAILIFF LANE SOUTHPORT, CT 06890	59842	Motors Liquidation Company	\$3,300,000.00	Partially Unliquidated claims	<i>Under Objection</i>
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT ATTN TIMOTHY J JUNK DAG 100 N SENATE AVE MAIL CODE 60-1 INDIANAPOLIS, IN 46204	59181	Motors Liquidation Company	\$72,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
ITW FOOD EQUIPMENT GROUP LLC KRISTIN B MAYHEW PEPE & HAZARD LLP 30 JELLIFF LANE SOUTHPORT, CT 06690 UNITED STATES OF AMERICA	59698	Motors Liquidation Company	\$3,300,000.00	Partially Unliquidated claims	<i>Under Objection</i>
JIS PERFORMING PARTY GROUP BASF CORP BRISTOL MYERS SQUIBB CO ET AL C/O MARY W KOKS, MUNSCH HARDT KOPF HARR PC 700 LOUISIANA #4600 HOUSTON, TX 77002	1273	Motors Liquidation Company	\$7,053,636.00	Partially Unliquidated claims	<i>Under Objection</i>
KELSEY HAYES COMPANY KRISTIN B MAYHEW POPE & HAZARD LLP 30 JELIFF LANE SOUTHPORT, CT 06890	59843	Motors Liquidation Company	\$3,300,000.00	Partially Unliquidated claims	<i>Under Objection</i>
KELSEY-HAYES COMPANY AS SUCCESSOR TO DAYTON WALTHER CORPORATION C/O SCOTT D BLACKHURST KELSEY-HAYES COMPANY 12001 TECH CENTER DRIVE LIVONIA, MI 48150	60991	Motors Liquidation Company	\$2,672,153.45	Partially Unliquidated claims	<i>Under Objection</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
LOCKHEED MARTIN CORPORATION C/O HANGLEY ARONCHICK SEGAL & PUDLIN ATTN MATTHEW A HAMERMESH ESQ & STEVEN T MIANO ESQ ONE LOGAN SQUARE 27TH FLOOR PHILADELPHIA, PA 19103 UNITED STATES OF AMERICA	43846	Motors Liquidation Company	\$12,498,818.63	Partially Unliquidated claims	<i>Under Objection</i>
MALLINCKRODT INC C/O JONATHAN ERIC BERRY, ESQ HUSCH BLACKWELL SANDERS LLP 190 CARONDELET PLAZA SUITE 600 ST LOUIS, MO 63105 UNITED STATES OF AMERICA	51339	Motors Liquidation Company	\$729,600.00	Partially Unliquidated claims	<i>Under Objection</i>
MANPOWER INC C/O DAVID L RIESER 77 WEST WACKER DRIVE SUITE 4100 CHICAGO, IL 60601	66747	Motors Liquidation Company	\$2,570,001.05	Partially Unliquidated claims	<i>Under Objection</i>
MARION BRAGG GROUP C/O JOHN HANSON BEVERIDGE & DIAMOND PC 1350 I STREET NW SUITE 700 WASHINGTON, DC 20005	50145	Motors Liquidation Company	\$131,871.00	Partially Unliquidated claims	<i>Under Objection</i>
MARK HYLAND BUREAU OF REMEDIATION AND WASTE MANAGEMENT DEPT OF ENVIRONMENTAL PROTECTION 17 STATE HOUSE STATION 28 TYSON DRIVE AUGUSTA, ME 04333	49692	Motors Liquidation Company	\$389,721.50	Partially Unliquidated claims	<i>Remaining Claim</i>
MEADWESTVACO CORPORATION C/O GEORGE F SANDERSON III ELLIS & WINTERS LLP PO BOX 33550 RALEIGH, NC 27636	59077	Motors Liquidation Company	\$31,911.80	Partially Unliquidated claims	<i>Remaining Claim</i>
MEMBERS OF THE BEMS GENERATOR GROUP JOHN R EMBICK ESQ C/O JOHN R EMBICK PLLC PO BOX 5234 WEST CHESTER, PA 19380	63378	Motors Liquidation Company	\$1,500.00	Partially Unliquidated claims	<i>Under Objection</i>

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
MEMBERS OF THE FRONTIER CHEMICAL SITE PRP GROUP AN UNINCORPORATED ASSOCIATION BY ITS CHAIRMAN A TIMOTHY WEBSTER C/O WEBSTER SZANYI LLP 1400 LIBERTY BLDG 424 MAIN STREET BUFFALO, NY 14202	43904	Motors Liquidation Company	\$1,398,000.00	Partially Unliquidated claims	<i>Under Objection</i>
METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY (MARTA) C/O GEORGE F SANDERSON III ELLIS & WINTERS LLP PO BOX 33550 RALEIGH, NC 27636	59079	Motors Liquidation Company	\$95,735.39	Partially Unliquidated claims	<i>Remaining Claim</i>
MISSOURI DEPARTMENT OF NATURAL RESOURCES JEFF KLUSMEIER ATTORNEY GENERALS OFFICE PO BOX 899 JEFFERSON CITY, MO 65102	60898	Motors Liquidation Company	\$544,261.08	Partially Unliquidated claims	<i>Remaining Claim</i>
MONTGOMERY CTY, OHIO & THE MONTGOMERY CTY SOLID WASTE DIST. DOUGLAS TROUT, ESQUIRE DAYTON-MONTGOMERY COUNTY COURTS BLDG 301 W THIRD STREET DAYTON, OH 45402 UNITED STATES OF AMERICA	47972	Motors Liquidation Company	\$463,038.38	Partially Unliquidated claims	<i>Remaining Claim</i>
NCR CORPORATION MATTHEW A HAMERMESH ESQUIRE HANGLEY ARONCHICK SEGAL & PUDLIN ONE LOGAN SQUARE 27TH FLOOR PHILADELPHIA, PA 19103	59910	Motors Liquidation Company	\$3,300,000.00	Partially Unliquidated claims	<i>Under Objection</i>
NCR CORPORATION MATTHEW A HAMERMESH ESQUIRE HANGLEY ARONCHICK SEGAL & PUDLIN ONE LOGAN SQUARE 27TH FLOOR PHILADELPHIA, PA 19103	59911	Motors Liquidation Company	\$1,634,368.92	Partially Unliquidated claims	<i>Under Objection</i>
NCR CORPORATION ATTN: MATTHEW A HAMERMESH, ESQ HANGLEY ARONCHICK SEGAL & PUDLIN ONE LOGAN SQUARE, 27TH FL PHILADELPHIA, PA 19103	59913	Motors Liquidation Company	\$32,204,771.43	Partially Unliquidated claims	<i>Under Objection</i>

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
NEW JERSEY DEPT OF ENVIRONMENTAL PROTECTION C/O ATTORNEY GENERAL OF NEW JERSEY ATTN RACHEL JEANNE LEHR RICHARD J HUGHES JUSTICE COMPLEX 25 MARKET STREET PO BOX 093 TRENTON, NJ 08625	44869	Motors Liquidation Company	\$105,955,131.12	Partially Unliquidated claims	<i>Remaining Claim</i>
NIAGARA MOHAWK POWER CORPORATION D/B/A NATIONAL GRID C/O HISCOCK & BARCLAY LLP ONE PARK PLACE 300 SOUTH STATE ST ATTN: SUSAN R KATZOFF ESQ SYRACUSE, NY 13202	50148	Motors Liquidation Company	\$317,871.62	Partially Unliquidated claims	<i>Under Objection</i>
NIAGARA MOHAWK POWER CORPORATION D/B/A NATIONAL GRID C/O HISCOCK & BARCLAY, LLP ATTN: SUSAN R KATZOFF, ESQ ONE PARK PLACE, 300 SOUTH STATE STREET SYRACUSE, NY 13202 UNITED STATES OF AMERICA	50660	Motors Liquidation Company	\$10,833,333.34	Partially Unliquidated claims	<i>Under Objection</i>
NIAGARA MOHAWK POWER CORPORATION D/B/A NATIONAL GRID C/O HISCOCK & BARCLAY LLP ONE PARK PLACE 300 SOUTH STATE STREET ATTN: SUSAN R. KATZOFF, ESQ. SYRACUSE, NY 13202	48499	Motors Liquidation Company	\$463,000,000.00	Partially Unliquidated claims	<i>Under Objection</i>
NIAGARA MOHAWK POWER CORPORATION D/B/A NATIONAL GRID C/O HISCOCK & BARCLAY LLP ATTN SUSAN R KATZOFF ESQ ONE PARK PLACE, 300 SOUTH STATE STREET SYRACUSE, NY 13202	70242	Motors Liquidation Company	\$130,500.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NL INDUSTRIES INCORPORATED C/O TRACEE THOMAS 5430 LBJ FREEWAY, SUITE 1700 DALLAS, TX 75240 UNITED STATES OF AMERICA	47946	Motors Liquidation Company	\$30,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NL INDUSTRIES INCORPORATED TRACEE THOMAS 5430 LBJ FREEWAY SUITE 1700 DALLAS, TX 75240	47947	Motors Liquidation Company	\$30,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
NORTH SHORE GAS COMPANY C/O STEPHEN H ARMSTRONG JENNER & BLOCK LLP 353 N CLARK STREET CHICAGO, IL 60654	59076	Motors Liquidation Company	\$17,207,531.22	Partially Unliquidated claims	<i>Under Objection</i>
NORTHROP GRUMMAN CORPORATION C/O BRIAN J HUFNAGEL ESQ, AARON GERSHONOWITZ ESQ PORCHELLI, CURTO, DEEGAN, SCHWARTZ, MINEO, COHN & TERRANA LLP 333 EARLE OVINGTON BLVD SUITE 1010 UNIONDALE, NY 11553	65762	Motors Liquidation Company	\$20,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NORTHROP GRUMMAN SPACE & MISSION SYSTEMS CORP. C/O GABRIEL CALVO 7555 COLSHIRE DRIVE M/S C-4S1 MCLEAN, VA 22102 UNITED STATES OF AMERICA	64595	Motors Liquidation Company	\$667,638.55	Partially Unliquidated claims	<i>Under Objection</i>
NORTHSIDE SANITARY LANDFILL TR C/O BARNES & THORNBURG ATTN JOHN KYLE 11 S MERIDIAN STREET INDIANAPOLIS, IN 46204	17251	Motors Liquidation Company	\$276,600.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION MAUREEN F LEARY ESQ ASSISTANT ATTORNEY GENERAL, ENVIRONMENTAL PROTECTION BUREAU OFFICE OF THE ATTORNEY GENERAL THE CAPITAL ALBANY, NY 12224 UNITED STATES OF AMERICA	50588	Motors Liquidation Company	\$11,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION ENVIRONMENTAL PROTECTION BUREAU - OFFICE OF THE ATTORNEY GENERAL ATTN MAUREEN F LEARY ESQ ASSISTANT ATTORNEY GENERAL THE CAPITOL ALBANY, NY 12224	69444	Environmental Corporate Remediation Company, Inc.	\$480,250.00	Partially Unliquidated claims	<i>Remaining Claim</i>
OHIO ENVIRONMENTAL PROTECTION AGENCY MICHELLE T SUTTER, ASSISTANT ATTORNEY GENERAL 30 EAST BROAD STREET 25TH FLOOR COLUMBUS, OH 43215 UNITED STATES OF AMERICA	50678	Motors Liquidation Company	\$55,363,540.90	Partially Unliquidated claims	<i>Remaining Claim</i>

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
OIL STEERING COMMITTEE C/O ALLAN HICKOWITZ ESQ NOSSAMAN LLP 445 S FIGUEROA STREET 31ST FLOOR LOS ANGELES, CA 90071	45842	Motors Liquidation Company	\$4,673,008.00	Partially Unliquidated claims	<i>Under Objection</i>
ONONDAGA COUNTY NEW YORK LUIS MENDEZ SR DEPUTY COUNTY ATTORNEY JOHN H MULROY CIVIC CENTER 10TH FLOOR 421 MONTGOMERY STREET SYRACUSE, NY 13202	51099	Motors Liquidation Company	\$12,498,817.00	Partially Unliquidated claims	<i>Remaining Claim</i>
OWENS-ILLINOIS, INC. C/O SUSAN SMITH THREE O-I PLAZA ONE MICHAEL OWENS WAY PERRYSBURG, OH 43551 UNITED STATES OF AMERICA	30281	Motors Liquidation Company	\$84,300.00	Partially Unliquidated claims	<i>Remaining Claim</i>
PETROLEUM TANK CLEANERS, INC BEVERIDGE & DIAMOND, PC ATT MICHAEL MURPHY ESQ 477 MADISON AVENUE 15TH FLOOR NEW YORK, NY 10022 UNITED STATES OF AMERICA	59071	Motors Liquidation Company	\$4,800,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
PHARMACIA CORPORATION BY ITS ATTORNEY IN FACT MONSANTO COMPANY C/O JONATHAN ERIC BERRY ESQ HUSCH BLACKWELL SANDERS LLP 190 CARONDELET PLAZA SUITE 600 ST LOUIS, MO 63105	46610	Motors Liquidation Company	\$729,600.00	Partially Unliquidated claims	<i>Under Objection</i>
QUANTA RESOURCES CORP C/O ALLEN G REITER ESQ/JAMES M SULLIVAN ESQ ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019	67107	Motors Liquidation Company	\$4,800,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
QUANTA RESOURCES CORP ALLEN G REITER, ESQ JAMES M SULLIVAN ESQ ARENT FOX LLP 1675 BROADWAY NEW YORK, NY 10019	67111	Motors Liquidation Company	\$20,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
REICHHOLD INC C/O DAVID FLYNN PHILLIPS LYTTLE LLP 3400 HSBC CENTER BUFFALO, NY 14203	44880	Motors Liquidation Company	\$56,712.00	Partially Unliquidated claims	<i>Remaining Claim</i>
REYNOLDS METALS COMPANY ATTN GENERAL COUNSEL 390 PARK AVENUE NEW YORK, NY 10022	49513	Motors Liquidation Company	\$84,300.00	Partially Unliquidated claims	<i>Remaining Claim</i>
ROBERT A GLADSTONE, ON BEHALF OF THE CLAIMANTS ON EXHIBIT "A" ON ATTACHED STMT OF CLM ROBERT A GLADSTONE, ESQ SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, PC 101 GROVERS MILL ROAD, SUITE 200 LAWRENCEVILLE, NJ 08648	1225	Motors Liquidation Company	\$10,100,554.50	Partially Unliquidated claims	<i>Under Objection</i>
ROCKWELL AUTOMATION INC ATTN IRVIN M FREILICH ROBERTSON FREILICH BRUNO & COHEN LLC 1 GATEWAY CENTER 17TH FL NEWARK, NJ 07102	59007	Motors Liquidation Company	\$20,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
ROTH GLOBAL PLASTICS INC C/O HARTER SECREST & EMERY LLP (JRW) 1600 BAUSCH & LOMB PLACE ROCHESTER, NY 14604	64854	Motors Liquidation Company	\$43,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
SC JOHNSON & SON INC ET AL C/O LINDA E BENFIELD AS HUNT'S SITE TRUSTEE FOLEY & LARDNER LLP 777 E WISCONSIN AVENUE MILWAUKEE, WI 53202	60563	Motors Liquidation Company	\$147,114.19	Partially Unliquidated claims	<i>Remaining Claim</i>
SCP CARLSTADT PRP GROUP C/O WILLIAM L. WARREN DRINKER BIDDLE & REATH LLP 105 COLLEGE ROAD EAST P.O. BOX 627 PRINCETON, NJ 08542 UNITED STATES OF AMERICA	43878	Motors Liquidation Company	\$81,869.00	Partially Unliquidated claims	<i>Under Objection</i>

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
SEALAND SUPERFUND SITE REMEDIATION TRUST ATTN DAVID L COOK ESQ NIXON PEABODY LLP 1100 CLINTON SQUARE ROCHESTER, NY 14604	51022	Motors Liquidation Company	\$291,171.60	Partially Unliquidated claims	<i>Under Objection</i>
SEARS ROEBUCK & CO C/O GEORGE F SANDERSON III ELLIS & WINTERS LLP PO BOX 33550 RALEIGH, NC 27636	59078	Motors Liquidation Company	\$63,823.60	Partially Unliquidated claims	<i>Remaining Claim</i>
SKINNER LANDFILL SITE PRP GROUP C/O MICHAEL J O'CALLAGHAN SHUMAKER, LOOP & KENDRICK LLP 41 S HIGH ST STE 2400 COLUMBUS, OH 43215	65679	Motors Liquidation Company	\$442,763.05	Partially Unliquidated claims	<i>Remaining Claim</i>
SOLUTIA INC. C/O JOHN COLLINS HUSCH BLACKWELL SANDERS LLP 190 CARONDELET PLAZA SUITE 600 ST. LOUIS, MO 63105	22393	Motors Liquidation Company	\$40,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
STATE OF ARKANSAS/ADEQ ARKANSAS ATTORNEY GENERAL ATTN KENDRA AKIN JONES 323 CENTER STREET STE 400 LITTLE ROCK, AR 72201	59318	Motors Liquidation Company	\$189,755.00	Partially Unliquidated claims	<i>Remaining Claim</i>
STATE OF MD DEPT OF THE ENVIRONMENT HORACIO TABLADA DIRECTOR OF LMA MARYLAND DEPARTMENT OF THE ENVIRONMENT 1800 WASHINGTON BLVD BALTIMORE, MD 21230	49515	Motors Liquidation Company	\$1,458,311.40	Partially Unliquidated claims	<i>Remaining Claim</i>
STATE OF NC DENR DIVISION OF WASTE MANAGEMENT JOHN G REEN JR ESQ NC OFFICE OF ATTORNEY GENERAL ENVIRONMENTAL DIVISION POST OFFICE BOX 629 RALEIGH, NC 27602 UNITED STATES OF AMERICA	44292	Motors Liquidation Company	\$631,060.00	Partially Unliquidated claims	<i>Remaining Claim</i>

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
STATE OF NC DENR-DIVISION OF WASTE MANAGEMENT JOHN R GREEN JR, ESQ NC OFFICE OF ATTORNEY GENERAL ENVIRONMENTAL DIVISION POST OFFICE BOX 629 RALEIGH, NC 27602 UNITED STATES OF AMERICA	44293	Motors Liquidation Company	\$97,913.20	Partially Unliquidated claims	<i>Remaining Claim</i>
STATE OF RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT TERENCE J TIERNEY S A A G DEPARTMENT OF ATTORNEY GENERAL 150 SOUTH MAIN STREET PROVIDENCE, RI 02903	46174	Motors Liquidation Company	\$625,230.00	Partially Unliquidated claims	<i>Remaining Claim</i>
STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES C/O WILLIAM H RAMSEY, ASSISTANT ATTORNEY GENERAL DEPARTMENT OF JUSTICE PO BOX 7857 MADISON, WI 53707	44759	Motors Liquidation Company	\$4,070,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
STEPAN COMPANY ATTN TIMOTHY W GARVEY ESQ LATSHA DAVIS YOHE & MCKENNA P C 350 EAGLEVIEW BLVD SUITE 100 EXTON, PA 19341	1458	Motors Liquidation Company	\$10,100,000.00	Partially Unliquidated claims	<i>Under Objection</i>
SUBSCRIBING PARTIES TO THE CHEMSOL SUPERFUND SITE TRUST FUND C/O WILLIAM H HYATT JR, ESQ K&L GATES LLP ONE NEWARK CENTER TENTH FLOOR NEWARK, NJ 07102	58958	Motors Liquidation Company	\$436,450.00	Partially Unliquidated claims	<i>Remaining Claim</i>
SUNRISE LANDFILL SITE PRP GROUP MICHEL O'NEAL WARNER NORCROSS & JUDD LLP 900 FIFTH THIRD CENTER, 111 LYON ST NW GRAND RAPIDS, MI 49503	16675	Motors Liquidation Company	\$3,296,656.00	Partially Unliquidated claims	<i>Remaining Claim</i>
SYRACUSE CHINA COMPANY C/O DUSTIN P ORDWAY ESQ ORDWAY LAW FIRM 300 OTTAWA AVENUE NW SUITE 801 GRAND RAPIDS, MI 49503	59968	Motors Liquidation Company	\$12,498,818.63	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
THE CITY OF ANDERSON INDIANA ATTN GARY MCKINNEY 120 EAST 8TH STREET PO BOX 2100 ANDERSON, IN 46018	61009	Motors Liquidation Company	\$4,200,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
THE PROCTER & GAMBLE CO ATTN: JOHN B PERSIANI DINSMORE & SHOHL LLP 255 E 5TH ST STE 1900 CINCINNATI, OH 45202	44839	Motors Liquidation Company	\$60,556,000.00	Partially Unliquidated claims	<i>Under Objection</i>
THE QUAKER OATS COMPANY ATTN LARS S JOHNSON ESQ VP - QTG/PCNA PATENT & ENVIRONMENTAL LAW PEPSICO CHICAGO 555 W MONROE ST MAIL CODE 11-12 CHICAGO, IL 60661	66214	Motors Liquidation Company	\$2,570,001.05	Partially Unliquidated claims	<i>Under Objection</i>
THE STANLEY WORKS ATTN IRVIN M FREILICH ROBERTSON FREILICH BRUNO & COHEN LLC 1 GATEWAY CENTER 17TH FL NEWARK, NJ 07102	51141	Motors Liquidation Company	\$4,800,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
THE STANLEY WORKS ATTN IRVIN M FREILICH ROBERTSON FREILICH BRUNO & COHEN LLC 1 GATEWAY CENTER 17TH FL NEWARK, NJ 07102	59008	Motors Liquidation Company	\$20,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
TOWN OF SALINA ATTN: FRANK C PAVIA HARRIS BEACH PLLC 99 GARNSEY RD PITTSFORD, NY 14534	47952	Motors Liquidation Company	\$10,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
UNITED STATES OF AMERICA C/O UNITED STATES ATTORNEY'S OFFICE NATALIE N KUEHLER, AUSA 86 CHAMBERS STREET, 3RD FLOOR NEW YORK, NY 10007	64064	Motors Liquidation Company	\$2,024,258,337.0 0	Partially Unliquidated claims	<i>Remaining Claim</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
UNITED TECHNOLOGIES CORP ON BEHALF OF CARRIER CORP WILLIAM F LEIKIN ESQ. ASST GENERAL COUNSEL UNITED TECHNOLOGIES CORP ONE FINANCIAL PLAZA MS 524 HARTFORD, CT 06103	59874	Motors Liquidation Company	\$12,498,818.63	Partially Unliquidated claims	<i>Under Objection</i>
UNITED TECHNOLOGIES CORPORATION, ON BEHALF OF ITS FORMER SUBSIDIARY ESSEX GROUP INC ATTN: WILLIAM F LEIKIN ESQ ASSISTANT GENERAL COUNSEL UNITED TECHNOLOGIES CORP ONE FINANCIAL PLAZA MS 524 HARTOFRD, CT 06103	59872	Motors Liquidation Company	\$42,519.00	Partially Unliquidated claims	<i>Under Objection</i>
UNIVAR USA INC UNIVAR USA INC C/O LESLIE R SCHENCK GARVEY SCHUBERT BARER 1191 SECOND AVENUE 18TH FLOOR SEATTLE, WA 98101	64812	Motors Liquidation Company	\$30,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
UNIVAR USA INC C/O LESLIE R SCHENCK GARVEY SCHUBERT BARER 1191 2ND AVE 18TH FL SEATTLE, WA 98101	64813	Motors Liquidation Company	\$30,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
UNIVAR USA INC C/O LESLIE R SCHENCK GARVEY SCHUBERT BARER 1191 SECOND AVE 18TH FL SEATTLE, WA 98101	64814	Motors Liquidation Company	\$5,000,000.00	Partially Unliquidated claims	<i>Under Objection</i>
VALLEYCREST LANDFILL SITE GROUP ATTN: JOHN B PERSIANI DINSMORE & SHOHL LLP 255 E 5TH ST, STE 1900 CINCINNATI, OH 45202 UNITED STATES OF AMERICA	50584	Motors Liquidation Company	\$287,636.00	Partially Unliquidated claims	<i>Under Objection</i>
VALLEYCREST LANDFILL SITE GROUP MEMBERS ATTN JOHN B PERSIANI DINSMORE & SHOHL LLP 255 E 5TH ST STE 1900 CINCINNATI, OH 45202	50586	Motors Liquidation Company	\$12,270,740.00	Partially Unliquidated claims	<i>Under Objection</i>

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
WASTE MANAGEMENT OF OHIO INC C/O JACQUOLYN E MILLS 1001 FANNIN STREET SUITE 4000 HOUSTON, TX 77002	64540	Motors Liquidation Company	\$60,556,000.00	Partially Unliquidated claims	<i>Under Objection</i>
WASTE MANAGEMENT OF OHIO INC C/O JACQUOLYN E MILLS 1001 FANNIN STREET SUITE 4000 HOUSTON, TX 77002	64541	Motors Liquidation Company	\$2,423,000.00	Partially Unliquidated claims	<i>Under Objection</i>
WASTE MANAGEMENT OF OHIO INC C/O JACQUOLYN E MILLS 1001 FANNIN STREET SUITE 4000 HOUSTON, TX 77002	64542	Motors Liquidation Company	\$12,270,000.00	Partially Unliquidated claims	<i>Under Objection</i>
WASTE-STREAM, INC ATTN: GENERAL COUNSEL (RE: POTSDAM SITE) C/O CASELLA WAST SYSTEMS, INC 25 GREENS HILL LN RUTLAND, VT 05701 UNITED STATES OF AMERICA	66754	Motors Liquidation Company	\$30,920,000.00	Partially Unliquidated claims	<i>Under Objection</i>
WATER SERVICES DEPT OF MONTGOMERY COUNTY OHIO DOUGLAS TROUT ESQUIRE DAYTON-MONTGOMERY COUNTY COURTS BLDG 301 W THIRD STREET DAYTON, OH 45402	47971	Motors Liquidation Company	\$23,120.00	Partially Unliquidated claims	<i>Remaining Claim</i>
YOSEMITE CREEK PRP GROUP C/O NICHOLAS W. VAN AELSTYN BEVERIDGE& DIAMOND PC 456 MONTGOMERY STREET, SUITE 1800 SAN FRANCISCO, CA 94104 UNITED STATES OF AMERICA	59918	Motors Liquidation Company	\$30,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

**EXHIBIT C**

**LITIGATION CLAIMS**

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
ANITA M KEDAS ALEX R KEDAS 310 N J ST  TILTON, IL 61833	69835	Remediation And Liability Management Company, Inc.	\$1,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BEJARANO, JOSE WAGNER COOK FREIBERGER & WASHIENKO LLC 18 TREMONT ST STE 903 BOSTON, MA 02108	28091	Motors Liquidation Company	\$300,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
FAST TEK GROUP LLC 9850 E 30TH ST  INDIANAPOLIS, IN 46229	21248	Motors Liquidation Company	\$2,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
GIRARD GIBBS LLP (COURT-APPROVED CLASS COUNSEL) ATTN A J DE BARTOLOMEO ESQ COURT-APPROVED CLASS COUNSEL IN JASON ANDERSON V GENERAL MOTORS CORP 601 CALIFORNIA ST SUITE 1400 SAN FRANCISCO, CA 94108	51093	Motors Liquidation Company	\$10,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
GIRARD GIBBS LLP (COURT-APPROVED CLASS COUNSEL) ATTN A J DE BARTOLOMEO ESQ COURT-APPROVED CLASS COUNSEL IN GENERAL MOTORS DEX- COOL/GASKET CASES 601 CALIFORNIA ST SUITE 1400 SAN FRANCISCO, CA 94108	51095	Motors Liquidation Company	\$3,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
GREENE & REID ATTN: DAVID MATT, JASON SMITH & BONITA STEVENS 173 INTREPID LN SYRACUSE, NY 13205	58985	Motors Liquidation Company	\$6,845.62	Partially Unliquidated claims	<i>Under Objection</i>
HARVEY WASHBURN SALES INC C/O SCOTT E STEVENS P O BOX 807 LONGVIEW, TX 75606	47950	Motors Liquidation Company	\$2,500,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
HETZER, MICHAEL A 2664 DARKE CT  CINCINNATI, OH 45233	15016	Motors Liquidation Company	\$2,900.00	Partially Unliquidated claims	<i>Remaining Claim</i>

## Exhibit C - Litigation Claims

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
HIGH POINT INS CO C/O ANDREA HEMSCHOOT ESQ LAW OFFICE OF DEBRA HART 303 FELLOWSHIP RD STE 300 MT LAUREL, NJ 08054	30854	Motors Liquidation Company	\$16,071.13	Partially Unliquidated claims	<i>Remaining Claim</i>
IRENE VENTURA 126 CASTLEMONT DRIVE GRASS VALLEY, CA 95945	32772	Motors Liquidation Company	\$400.00	Partially Unliquidated claims	<i>Remaining Claim</i>
IRVINE, JOHN GIRARD GIBBS & DEBARTOLOMEO LLP 601 CALIFORNIA ST STE 1400 SAN FRANCISCO, CA 94108	51092	Motors Liquidation Company	\$549.00	Partially Unliquidated claims	<i>Under Objection</i>
JANE TYLEND 2373 ANDRUS HAMTRAMCK, MI 48212 UNITED STATES OF AMERICA	30795	Motors Liquidation Company	\$100.00	Partially Unliquidated claims	<i>Remaining Claim</i>
JULIA MCLAUGHLIN 4207 45TH STREET EAST BRADENTON, FL 34208	25278	Motors Liquidation Company	\$690.87	Partially Unliquidated claims	<i>Remaining Claim</i>
LEE J FULLER C/O KEIS GEORGE LLP KEIS GEORGE LLP 55 PUBLIC SQUARE, #800 CLEVELAND, OH 44113	65950	Motors Liquidation Company	\$12,792.85	Partially Unliquidated claims	<i>Remaining Claim</i>
LINDA DALLAS 3070 ALSTONE DR DECATUR, GA 30032 UNITED STATES OF AMERICA	21068	Motors Liquidation Company	\$800.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LONG, RICHARD C HOLT, KRISTINE W 1518 WALNUT ST STE 800 PHILADELPHIA, PA 19102	19900	Motors Liquidation Company	\$75,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
MARCUS JORDAN GERALD D WAHL (P26511) STERLING ATTORNEYS AT LAW PC 30500 NORTHWESTERN HWY STE 425 FARMINGTON HILLS, MI 48048	11039	Motors Liquidation Company	\$300,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MATT DAVID MATT, DAVID 173 INTREPID LN SYRACUSE, NY 13205	58984	Motors Liquidation Company	\$6,845.62	Partially Unliquidated claims	<i>Under Objection</i>
MCCOMBS PONTIAC-GMC TRUCK LTD ROBERT R BIECHLIN JR THORNTON BIECHLIN, SEGRATO, REYNOLDS & GUERRA LC 100 N E LOOP 410 SUITE 500 SAN ANTONIO, TX 78216	30870	Motors Liquidation Company	\$5,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
METROPOLITAN P&C INSURANCE CO ATTN RICHARD J PLOUFFE ESQ 40 GROVE ST STE 220 WELLESLEY, MA 02482	1377	Motors Liquidation Company	\$34,732.95	Partially Unliquidated claims	<i>Remaining Claim</i>
NAZAREEN WARD 2038 85TH AVE  OAKLAND, CA 94621 UNITED STATES OF AMERICA	14949	Motors Liquidation Company	\$1,500,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
PALUMBO, MICHELE C/O CHARLES HESS, ATTORNEY 7211 SAWMILL ROAD, SUITE 200 DUBLIN, OH 43016	45190	Motors Liquidation Company	\$17,646.00	Partially Unliquidated claims	<i>Remaining Claim</i>
PATRICIA CRAIG C/O SAM MORGAN ESQ GASIOREK MORGAN & GRECO PC 30500 NORTHWESTERN HWY SUITE 425 FARMINGTON HILLS, MI 48334	540	Motors Liquidation Company	\$100,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
PROGRESSIVE CASUALTY INSURANCE COMPANY KEIS GEORGE LLP 55 PUBLIC SQUARE #800 CLEVELAND, OH 44113	65952	Motors Liquidation Company	\$9,301.29	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
PROGRESSIVE MAX INSURANCE COMPANY KEIS GEORGE LLP 55 PUBLIC SQUARE #800 CLEVELAND, OH 44113	65953	Motors Liquidation Company	\$19,817.47	Partially Unliquidated claims	<i>Remaining Claim</i>
ROBERT PIZANO C/O ARTURO ACOSTA DOVALINA & EURESTE LLP 122 TUAM ST STE 100 HOUSTON, TX 77006	58955	Motors Liquidation Company	\$25,610.00	Partially Unliquidated claims	<i>Remaining Claim</i>
ROGER L THACKER ROGER L SANDERS THOMAS J HANSON HELMER MARTINS RICE & POPHAM CO, LPA 600 VINE ST SUITE 2704 CINCINNATI, OH 45202	27105	Motors Liquidation Company	\$50,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
SANFORD TENEBBAUM 1955 YOSEMITE BLVD. APT. 30 BIRMINGHAM, MI 48009 UNITED STATES OF AMERICA	22286	Motors Liquidation Company	\$4,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
SHAH ATUL C MD 2884 MANORWOOD DR TROY, MI 48085	28820	Motors Liquidation Company	\$10,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
SIMON PROPERTY GROUP C/O GEORGE DUNCAN DUNCAN & ADAIR, P.C. 7000 CENTRAL PARKWAY SUITE 220 ATLANTA, GA 30328	17566	Motors Liquidation Company	\$100,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
SMITH, JASON J GREENE & REID 173 INTREPID LN SYRACUSE, NY 13205	58983	Motors Liquidation Company	\$10,485.48	Partially Unliquidated claims	<i>Under Objection</i>
STATE FARM MUTUAL ATUOMOBILE INSURANCE COMPANY KEIS GEORGE LLP 55 PUBLIC SQUARE #800 CLEVELAND, OH 44113	65951	Motors Liquidation Company	\$30,707.75	Partially Unliquidated claims	<i>Remaining Claim</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
STEVENS, BONITA GREENE & REID 173 INTREPID LN SYRACUSE, NY 13205	58987	Motors Liquidation Company	\$2,147.04	Partially Unliquidated claims	<i>Under Objection</i>
THE MASTROMARCO FIRM ATTY FOR GERALD HAYNOR 1024 N. MICHIGAN AVE SAGINAW, MI 48602	51383	Motors Liquidation Company	\$75,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
TOWN CENTER AT COBB, LLC C/O GEORGE DUNCAN DUNCAN & ADAIR, P.C. 7000 CENTRAL PARKWAY SUITE 220 ATLANTA, GA 30328	17567	Motors Liquidation Company	\$100,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
UNIVERSAL UNDERWRITERS INS CO & ITS AFFILIATES C/O FOX HEFTER SWIBEL LEVIN & CARROLL LLP ATTN MARGARET M ANDERSON 200 W MADISON ST SUITE 3000 CHICAGO, IL 60606	70572	Motors Liquidation Company	\$9,884,703.00	Partially Unliquidated claims	<i>Remaining Claim</i>
VEHICLE OCCUPANT SENSING SYSTEM LLC C/O TADLOCK LAW FIRM ATTN: CRAIG TADLOCK ESQ 400 E ROYAL LANE SUITE 290 IRVING, TX 75039	70758	Motors Liquidation Company	\$37,500,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
WESTERN RESERVE MUTUAL CASUALTY COMPANY ROBERTS, MATEJCZYK AND ITACO LPA 5045 PARK AVE WEST SUITE 2B SEVILLE, OH 44273	46153	Motors Liquidation Company	\$33,035.62	Partially Unliquidated claims	<i>Remaining Claim</i>
WESTERN RESERVE MUTUAL CASUALTY COMPANY ROBERTS, MATEJCZYK AND ITACO LPA 5045 PARK AVENUE WEST SUITE 2B SEVILLE, OH 44273	46155	Motors Liquidation Company	\$19,363.88	Partially Unliquidated claims	<i>Remaining Claim</i>
WICE HARVEY 50 CROCKER BLVD, SUITE 100 MOUNT CLEMENS, MI 48043	30947	Motors Liquidation Company	\$250,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

## Exhibit C - Litigation Claims

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
WIRTH THOMAS WIRTH, THOMAS 27780 NOVI RD STE 105 NOVI, MI 48377	45159	Motors Liquidation Company	\$25,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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**EXHIBIT D**

**DEBT CLAIMS**

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
ALEKSANDER & WALDEMAR MALINOWSKI, MDS SECHSHAUSERSTRASSE 88-82/2/12 1150 WIEN (VIENNA) AUSTRIA AUSTRIA	68079	Motors Liquidation Company	\$125,000.00	Partially Unliquidated claims	<i>Under Objection</i>
ALEKSANDER AND WALDEMAR MALINOWSKI SECHSHAUSERSTRASSE 88-92/2/12 1150 WIEN VIENNA AUSTRIA AUSTRIA	68493	Motors Liquidation Company	\$125,000.00	Partially Unliquidated claims	<i>Under Objection</i>
ANGELOS MICHOS, VASILIKI PAPADOPOULOU, IRANNIS MICHOS, GEORGIOS MICHOS 218 EFYINOU PONPOU ST, NEA SMIRNI, 17123, GREECE GREECE	18830	Motors Liquidation Company	\$430,000.00	Partially Unliquidated claims	<i>Under Objection</i>
APPALOOSA INVESTMENT LIMITED PARTNERSHIP I C/O APPALOOSA MANAGEMENT LP 51 JOHN F KENNEDY PARKWAY ATTN KENNETH MAIMAN SHORT HILLS, NJ 07078	67498	Motors Liquidation Company	\$74,182,199.51	Partially Unliquidated claims	<i>Remaining Claim</i>
AUDENAERT HENDRIK CORTEWALLEDREEF 57/2 B 9120 BEVEREN WAAS BELGIUM BELGIUM	70750	Motors Liquidation Company	\$106,192.50	Partially Unliquidated claims	<i>Remaining Claim</i>
AURELIUS INVESTMENT LLC 535 MADISON AVENUE 22ND FLOOR ATTN DAN GROPPER NEW YORK, NY 10022 UNITED STATES OF AMERICA	66265	Motors Liquidation Company	\$138,250,962.36	Partially Unliquidated claims	<i>Remaining Claim</i>
AWERBUCH MD PLLC 5889 BAY RD STE 104 SAGINAW, MI 48604	7566	Motors Liquidation Company	\$98,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BANCA ADIGE PO CREDITO COOPERATIVO LUSIA SOCIETA COOPERATIVA VIALE EUROPA 95 ATTN OLIVO PERZOLLA 45020 LUSIA RO ITALIA ITALY	66038	Motors Liquidation Company	\$2,756,608.83	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
BANCA CASSA DI RISPARMIO DI SAVIGLIANO S P A ATTN SILVIA DARO PIAZZA DEL POPOLO 15 12038 SAVIGLIANO CN ITALIA ITALY	66040	Motors Liquidation Company	\$518,282.60	Partially Unliquidated claims	<i>Under Objection</i>
BANCA CREMONESE CREDITO COOPERATIVO SOCIETA COOPERATIVA ATTN LAURA FRANZOSI/CLAUDIA GHIRALDI VIA PREJER 10 26020 CASALMORANO (CR) ITALIA ITALY	65923	Motors Liquidation Company	\$313,851.87	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DE CREDITO COOPERATIVO DELLE PREALPI SOCIETA COOPERATIVA VIA ROMA 87 ATTN STEFANO MORINI 31020 TARZO (TV) ITALY ITALY	65981	Motors Liquidation Company	\$292,556.86	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CARNIA E GEMONESE CREDITO COOPERATIVO SOCIETA COOPERATIVA ATTN PAOLO PERESSINI / ALBERTO BROLLO VIA CARNIA LIBERA 1944 25 33028 TOLMEZZO UD ITALIA ITALY	66021	Motors Liquidation Company	\$33,162.54	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO ABRUZZESE CAPPELLE SUL TAVO SOCIETA COOPERTIVA VIA UMBERTO I N78/80 65010 CAPPELLE SUL TABO PE ATTN MASSIMO FERRATI 65010 CAPPELLE SUL TABO PE ITALIA ITALY	65934	Motors Liquidation Company	\$112,486.32	Partially Unliquidated claims	<i>Remaining Claim</i>
BANCA DI CREDITO COOPERATIVO DE BARLASSINA (MILANO) SOCIETA COOPERATIV ATTN GRAZIA PONTIGGIA/ROBERTO MORELLI VIA C COLUMBO 1/3 20030 BARLASSINA (MI) ITALIA ITALY	65919	Motors Liquidation Company	\$451,425.20	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DEL CARSO-ZADRUZNA KRASKA BANKA SOCIETA COOPERATIVA ATTN: RADIVOJ RACMAN VIA DEL RICREATORIO 2 34151 TRIESTE (TS) ITALIA ITALY	66002	Motors Liquidation Company	\$78,827.26	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
BANCA DI CREDITO COOPERATIVO DI CALCIO E DI COVO - SOCIETA COOPERATIVA VIA PAPA GIOVANNI XXIII N 51 ATTN GIOVANNA PREVITALI 24054 CALCIO ITALY ITALY	65993	Motors Liquidation Company	\$407,440.71	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DI CARATE BRIANZA SOCIETA COOPERATIVA ATTN MICHELE BRENNIA VIA CUSANI 6 20048 CARATA BRIANZA (MI) ITALIA ITALY	65921	Motors Liquidation Company	\$428,209.47	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DI CHERASCO SOCIETA COOPERATIVA ATTN SARA CHESSA / ALESSANDRA MOGNA VIA BRA 15 RORETO DI CHERASCO (CN) ITALIA ITALY	65925	Motors Liquidation Company	\$698,814.98	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DI CIVITANOVA MARCHE E MONTECOSARO SOCIETA COOPERATIVA ATTN ANDREA PIERINI/LEOPOLDO RAPAGNANI VIALE MATTEOTTI N 8 62012 CIVITANOVA MARCHE (MC) ITALIA ITALY	65927	Motors Liquidation Company	\$1,813,988.14	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DI DOBERDO E SAVOGNA SOCIETA COOPERATIVA ATTN KATIA PIRC/ CRISTINA KRAVOS VIA ROMA 23 34070 DOBERDO DEL LAGO (GORIZIA) ITALIA ITALY	65988	Motors Liquidation Company	\$142,083.06	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DI DOVERA E POSTINO SOCIETA SOCIETA COOPERATIVA VIA EUROPA 6/1 ATTN ISABELLA BONIZZI/STEFANIA BARZIZZA 26010 DOVERA CR ITALY ITALY	65983	Motors Liquidation Company	\$101,930.80	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DI FIUGGI SOCIETA COOPERATIVA ATTN PIETRO DUCA VIA GARIBALDI 18 03014 FIUGGI ITALIA ITALY	66062	Motors Liquidation Company	\$101,407.46	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
BANCA DI CREDITO COOPERATIVO DI GRADARA SOCIETA COOPERATIVA ATTN FABRIZIO REGGIANI/ CHRISTIAN FRANCHINI VIA CATTOLICA 20 61012 GRADARA ITALIA ITALY	66063	Motors Liquidation Company	\$395,707.91	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DI LESMO SOCIETA COOPERATIVA ATTN CARLO BORSETTO PIAZZA DANTE 21/22 20050 LESMO MI ITALY ITALY	66011	Motors Liquidation Company	\$693,348.80	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DI PERGOLA - SOCIETA COOPERATIVA VIALE MARTIRI DELLA LIBERTA 46/B ATTN GIOVANNI LONDER 61045 PERGOLA ITALY ITALY	66024	Motors Liquidation Company	\$96,576.48	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DI POMPIANO E DELLA FRANCIACORTA POMPIANO SOCIETA COOPERATIVE ATTN PIETRO BIGNETTI PIAZZA S ANDREA 12 25030 POMPIANO ITALIA ITALY	65984	Motors Liquidation Company	\$58,444.58	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DI PRATOLA PELIGNA SOCIETA COOPERATIVA ATTN CATIA DE STEPHANIS VIA ANTONIO GRAMSCI 136 67035 PRATOLA PELIGNA ITALIA ITALY	66060	Motors Liquidation Company	\$398,064.23	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO DI ROMA SOCIETA COOPERATIVA ATTN MR ROBERTO PALOMBO AND MR ROSSANO GIUPPA VIALE OCEANO INDIANO 13C 00144 ROMA ITALY ITALY	67035	Motors Liquidation Company	\$2,077,233.47	Partially Unliquidated claims	<i>Remaining Claim</i>
BANCA DI CREDITO COOPERATIVO DI S ELENA SOCIETA COOPERATIVA ATTN LOREDANA MINGARDO VIA ROMA 10 35040 S ELENA (PD) ITALIA ITALY	66005	Motors Liquidation Company	\$1,381,151.23	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
BANCA DI CREDITO COOPERATIVO DI SAN GIOGIO E MEDUNO SOCIETA COOPERATIVA ATTN ANDREA TREVISO VIA RICHINVELDA 4 33095 SAN GIORGIO DELLA RICHINVELDA PN ITALIA ITALY	66036	Motors Liquidation Company	\$20,281.49	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO PORDENONESE SOCIETA COOPERATIVA ATTN PIERANTONIO REDIVO VIA TRENTO 1 3 33082 AZZANO DECIMO PN ITALY ITALY	65995	Motors Liquidation Company	\$5,694,137.63	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI CREDITO COOPERATIVO S VICENZO DE PAOLI DI CASAGIOVE - SOCIETA COOPERATIVA PER AZIONI VIA MADONNA DI POMPEI ATTN ANGELA SANTORO 4 - 81022 CASAGIOVE ITALIA ITALY	65989	Motors Liquidation Company	\$291,036.87	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI FORLI CREDITO COOPERATIVO SOCIETA COOPERATIVA ATTN ANDREA GALLEGATI/ GABRIELE FABBRI CORSO DELLA REPUBBLICA 2/4 47100 FORLI (FC) ITALIA ITALY	66018	Motors Liquidation Company	\$628,367.41	Partially Unliquidated claims	<i>Under Objection</i>
BANCA DI VERONA CREDITO COOPERATIVO CADIDAVID SOCIETA COOPERATIVA PER AZIONI VIA FORTE TOMBA 8 ATTN ANDREA CERADINI FRAZ CA DI DAVID 37135 VERONA ITALY ITALY	66027	Motors Liquidation Company	\$280,248.65	Partially Unliquidated claims	<i>Under Objection</i>
BANCA MALATESTIANA CREDITO COOPERATIVO - SOCIETA COOPERATIVA VIA XX SETTEMBRE 63 ATTN STEFANO CLEMENTI/ BARBARA COLOMBINI 47900 RIMINI ITALY ITALY	65990	Motors Liquidation Company	\$472,043.32	Partially Unliquidated claims	<i>Under Objection</i>
BANCA POPOLARE DI VICENZA SCPA ATTENTION MR UMBERTO MAGGIO VIA BTG FRAMARIN, 18 36100 VICENZA ITALY ITALY	60251	Motors Liquidation Company	\$16,209,432.27	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
BANCA SAN GIORGIO E VALLE AGNO CREDITO COOPERATIVO DI FARA VICENTINO SOCIETA COOPERATIVA ATTN PASINI OTTORINO VIA PERLENA 78 36030 SAN GIORGIO DI PERIENA VI ITALY ITALY	66068	Motors Liquidation Company	\$287,079.85	Partially Unliquidated claims	<i>Under Objection</i>
BANK LEUMI USA 562 FIFTH AVENUE  NEW YORK, NY 10036	65806	Motors Liquidation Company	\$577,517.29	Partially Unliquidated claims	<i>Under Objection</i>
BHALODIA RV/RM/PATEL R G PORTLAND HOUSE 69-71 WEMBLEY HILL ROAD WEMBLEY MIDDLESEX, HA9 8B11 UK GREAT BRITAIN	68705	Motors Liquidation Company	\$360,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BROWN-JACKSON, ANITA PO BOX 82893  CONYERS, GA 30013	62596	Motors Liquidation Company	\$79,995.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BRUNAUD ANDRE MARCELLE 9 APPEES DES BESSES 36200 LE MENOUX FRANCE FRANCE	65570	Motors Liquidation Company	\$24,987.00	Partially Unliquidated claims	<i>Under Objection</i>
C.I.K. INVESTMENTS S.A. 56 EVRIPIDOU STREET 383 33 VOLOS, GREECE GREECE	20713	Motors Liquidation Company	\$3,120,700.00	Partially Unliquidated claims	<i>Under Objection</i>
CANYON VALUE REALIZATION FUND LP c/o SIDLEY AUSTIN LLP ATTN: JEREMY ROSENTHAL, ESQ. 555 WEST FIFTH STREET, 40TH FLOOR LOS ANGELES, CA 90013	69306	Motors Liquidation Company	\$8,007,741.00	Partially Unliquidated claims	<i>Remaining Claim</i>
CANYON-GRF MASTER FUND LP c/o SIDLEY AUSTIN LLP ATTN: JEREMY ROSENTHAL, ESQ. 555 WEST FIFTH STREET, 40TH FLOOR LOS ANGELES, CA 90013	69308	Motors Liquidation Company	\$1,890,945.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
CASSA CENTRALE BANCA-CREDITO COOPERATIVO DEL NORD EST S.P.A VIA G SEGANTINI 5 ATTN MS MANUELA ACLER 38100 TRENTO ITALY ITALY	60993	Motors Liquidation Company	\$3,804,184.20	Partially Unliquidated claims	<i>Remaining Claim</i>
CASSA RAIFFEISEN MERANO - SOCIETA COOPERATIVA ATTN: PETER GRUBER/DOTT MARTIN KLOTZNER CORSO LIBERTA 40 39012 MERANO (BZ) ITALIA ITALY	65909	Motors Liquidation Company	\$41,546.82	Partially Unliquidated claims	<i>Under Objection</i>
CITIGROUP GLOBAL MARKETS INC ATTN KEN ZINGALE, CORP ACTIONS 111 WALL STREET, 4TH FLOOR NEW YORK, NY 10005	69552	Motors Liquidation Company	\$29,028,913.95	Partially Unliquidated claims	<i>Remaining Claim</i>
CREDITO COOPERATIVO VALDINIEVOLE SOCIETA COOPERATIVA ATTN ANNA BALDECCHI UFFICIO FINANZA VIA UGO FOSCOLO 16/2 51016 MONTECATINI TERME (PT) ITALIA ITALY	66008	Motors Liquidation Company	\$310,039.32	Partially Unliquidated claims	<i>Under Objection</i>
CREDITO COOPERATIVO-CASSA RURALE ED ARTIGIANA DE LUCINICO FARRA E CAPRIVA-SOCIETA COOPERATIVA VIA VISINI 2 - ATTN SANDRO LORENZUT / MAURIZIO FRANCO 34170 GORIZIA (GO) ITALIA ITALY	66039	Motors Liquidation Company	\$141,298.87	Partially Unliquidated claims	<i>Under Objection</i>
CREDITO EMILIANO SPA ATTN: MR LUCA MARIANI VIA FMILIA S PIETRO 4 42100 REGGIO EMILIA ITALY ITALY	60568	Motors Liquidation Company	\$30,320,827.36	Partially Unliquidated claims	<i>Remaining Claim</i>
DEUTSCHE BANK S P A ATTN MR ANDREA CASTALDI PIAZZA DEL CALENDARIO 7 20126 MILANO ITALY ITALY	60964	Motors Liquidation Company	\$16,275,871.66	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
DOUGLAS B FOSTER 1338 RT9  SPOFFORD, NH 03462 UNITED STATES OF AMERICA	14685	Motors Liquidation Company	\$25,000.00	Partially Unliquidated claims	<i>Under Objection</i>
DR ANDREUS HESSE WIESUGRUNDSTR 7A 57482 WENDEU GERMANY GERMANY	27061	Motors Liquidation Company	\$42,857.10	Partially Unliquidated claims	<i>Under Objection</i>
DRAWBRIDGE DSO SECURITIES LLC 1345 AVENUE OF THE AMERICAS 46TH FLOOR ATTN CONSTANTINE M DAKOLIAS NEW YORK, NY 10105	67428	Motors Liquidation Company	\$27,466,464.50	Partially Unliquidated claims	<i>Remaining Claim</i>
DRAWBRIDGE OSO SECURITIES LLC 1345 AVENUE OF THE AMERICAS 46TH FLOOR ATTN CONSTANTINE M DAKOLIAS NEW YORK, NY 10105	67500	Motors Liquidation Company	\$4,443,560.05	Partially Unliquidated claims	<i>Remaining Claim</i>
EDWARD R BARRON 1 LONGFELLOW PL APT 3218  BOSTON, MA 02114	21942	Motors Liquidation Company	\$20,000.00	Partially Unliquidated claims	<i>Under Objection</i>
ELLIOTT INTERNATIONAL LP C/O ELLIOTT MANAGEMENT CORPORATION ATTN: ELLIOT GREENBERG 712 FIFTH AVENUE 35TH FLOOR NEW YORK, NY 10019 UNITED STATES OF AMERICA	66266	Motors Liquidation Company	\$85,698,820.86	Partially Unliquidated claims	<i>Remaining Claim</i>
EMILBANCA CREDITO COOPERATIVO SOCIETA COOPERATIVA ATTN LUIGI TACCHI VIA MAZZINI 15 BOLOGNA 40138 ITALIA ITALY	66045	Motors Liquidation Company	\$1,577,963.16	Partially Unliquidated claims	<i>Under Objection</i>
EUGENE L PETRINI 14802 N BOLIVAR DR  SUN CITY, AZ 85351	70574	Motors Liquidation Company	\$0.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
EVA ESCHHOLZ FUHRENKAMP 11 27721 RITTERHUDE GERMANY GERMANY	20675	Motors Liquidation Company	\$621,417.20	Partially Unliquidated claims	<i>Under Objection</i>
FCOF UB SECURITIES LLC ATTN CONSTANTINE M DAKOLIAS 1345 AVENUE OF THE AMERICAS 46TH FLOOR NEW YORK, NY 10105 UNITED STATES OF AMERICA	67499	Motors Liquidation Company	\$4,562,092.98	Partially Unliquidated claims	<i>Remaining Claim</i>
GERRY L MENDELSON TTEE FBO GERRY MENDELSON REV TR U/A/D 08-15-2005 1512 PALISADE AVE, APT 14 N FORT LEE, NJ 07024	8085	Motors Liquidation Company	\$54,339.64	Partially Unliquidated claims	<i>Under Objection</i>
GERT AND GISELA FRANKE IM EICHWALD 39 HEUSENSTAMM 63150 GERMANY GERMANY	17504	Motors Liquidation Company	\$15,000.00	Partially Unliquidated claims	<i>Under Objection</i>
HELEN Z MEIER 401 D'ERCOLE COURT UNIT 226 NORWOOD, NJ 07648	4783	Motors Liquidation Company	\$24,987.35	Partially Unliquidated claims	<i>Under Objection</i>
HERMAN, DOROTHY B 5168 CORNERS DR W BLOOMFIELD, MI 48322	44092	Motors Liquidation Company	\$8,779.08	Partially Unliquidated claims	<i>Under Objection</i>
HERTA HILLERS KIRCHBUEHL 4 6314 UNRERAEGERI, SWITZERLAND SWITZERLAND	16603	Motors Liquidation Company	\$30,000.00	Partially Unliquidated claims	<i>Under Objection</i>
HOLDERS OF 8 375% & 8 875% GTD NOTES DESCRIBED IN ANNEXED ATTACHMENT FISCAL AGENT DEUTSCHE BANK LUXEMBOURG S A ATTN COUPON PAYING DEPARTMENT 2 BLD KONRAD ADENAUER L-1115 LUXEMBOURG LUXEMBOURG	69551	Motors Liquidation Company	\$1,072,557,531.7 2	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
HOU LI ANTONLANGERGASSE 46/2/1 1130 VIENNA AUSTRIA AUSTRIA	61782	Motors Liquidation Company	\$2,000.00	Partially Unliquidated claims	<i>Under Objection</i>
INGRID TANGERMANN WALDSTR 15 21465 REINBEK, GERMANY GERMANY	16602	Motors Liquidation Company	\$20,000.00	Partially Unliquidated claims	<i>Under Objection</i>
INTESA SANPAOLO PRIVATE BANKING S.P.A. 20121 MILANO VIA HOEPLI 10 ITALY ITALY	66448	Motors Liquidation Company	\$55,066,679.30	Partially Unliquidated claims	<i>Remaining Claim</i>
INTESA SANPAOLO SPA VIA VERDI 8 MILANO 20121 ITALY ITALY	66462	Motors Liquidation Company	\$119,783,758.06	Partially Unliquidated claims	<i>Remaining Claim</i>
JBH BRUNAUD JACQUES DOMAINE LE TERTRE CIRON 36300 LE BLANC FRANCE FRANCE	65589	Motors Liquidation Company	\$24,987.00	Partially Unliquidated claims	<i>Under Objection</i>
JOANNE F LABINER 722 BROADWAY #8 NEW YORK, NY 10003	9215	Motors Liquidation Company	\$16,000.00	Partially Unliquidated claims	<i>Under Objection</i>
JOHN T O'MALLEY 10 CASCO COURT LAKEWOOD, NJ 08701	6894	Motors Liquidation Company	\$11,448.05	Partially Unliquidated claims	<i>Under Objection</i>
JP MORGAN SECURITIES LIMITED 125 LONDON WALL ATTN: ANGUS J SCOTT LONDON EC2Y 5AJ, UNITED KINGDON GREAT BRITAIN	67022	Motors Liquidation Company	\$41,204,777.53	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
JULIAN P KORNFELD 4100 PERIMETER CENTER DR STE 150 OKLAHOMA CITY, OK 73112	11518	Motors Liquidation Company	\$105,000.00	Partially Unliquidated claims	<i>Under Objection</i>
KENNETH M TAYLOR CGM IRA ROLLOVER CUSTODIAN P.O. BOX 527 KARNACK, TX 75661	10932	Motors Liquidation Company	\$50,000.00	Partially Unliquidated claims	<i>Under Objection</i>
LAW DEBENTURE TRUST COMPANY OF NEW YORK AS SUCCESSOR INDENTURE TRUSTEE ATTN MR ROBERT BICE 400 MADISON AVENUE 4TH FLOOR NEW YORK, NY 10017	60006	Motors Liquidation Company	\$10,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LAW DEBENTURE TRUST COMPANY OF NEW YORK AS SUCCESSOR ENDENTURE TRUSTEE ATTN MR ROBERT BICE 400 MADISON AVENUE 4TH FLOOR NEW YORK, NY 10017	60007	Motors Liquidation Company	\$12,500,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LAW DEBENTURE TRUST COMPANY OF NEW YORK AS SUCCESSOR INDENTURE TRUSTEE ATTN MR ROBERT BICE 400 MADISON AVENUE 4TH FLOOR NEW YORK, NY 10017	60008	Motors Liquidation Company	\$1,400,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LAW DEBENTURE TRUST COMPANY OF NEW YORK AS SUCCESSOR INDENTURE TRUSTEE ATTN MR ROBERT BICE 400 MADISON AVENUE 4TH FLOOR NEW YORK, NY 10017	60009	Motors Liquidation Company	\$58,800,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LAW DEBENTURE TRUST COMPANY OF NEW YORK AS SUCCESSOR INDENTURE TRUSTEE 400 MADISON AVENUE 4TH FLOOR ATTN MR ROBERT RICE NEW YORK, NY 10017	60010	Motors Liquidation Company	\$46,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LAW DEBENTURE TRUST COMPANY OF NEW YORK AS SUCCESSOR INDENTURE TRUSTEE 400 MADISON AVENUE 4TH FLOOR ATTN MR ROBERT BICE NEW YORK, NY 10017	60011	Motors Liquidation Company	\$20,040,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
LAW DEBENTURE TRUST COMPANY OF NEW YORK AS SUCCESSOR INDENTURE TRUSTEE 400 MADISON AVENUE 4TH FLOOR ATTN MR ROBERT BICE NEW YORK, NY 10017	60012	Motors Liquidation Company	\$31,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LESLIE MYERSON 12 RICHMOND B  DEERFIELD BEACH, FL 33442	32689	Motors Liquidation Company	\$1,900.00	Partially Unliquidated claims	<i>Under Objection</i>
LYXOR/CANYON VALUE REALIZATION FUND LIMITED c/o SIDLEY AUSTIN LLP ATTN: JEREMY ROSENTHAL, ESQ. 555 WEST FIFTH STREET, 40TH FLOOR LOS ANGELES, CA 90013	69307	Motors Liquidation Company	\$3,321,486.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MATTHIAS INNERKOFER VIA BARLETTA 8 IT-39100 BOLZANO (ITALY) ITALY	1212	Motors Liquidation Company	\$100,000.00	Partially Unliquidated claims	<i>Under Objection</i>
MICHAEL ZIMMERMANN TRESCKOWSTRASSE 50 20259 HAMBURG GERMANY GERMANY	30955	Motors Liquidation Company	\$6,000.00	Partially Unliquidated claims	<i>Under Objection</i>
MR JOCHEN BADERSCHNEIDER VEICHTEDERPOINTWEG 33 84036 LANDSHUT, GERMANY GERMANY	1115	Motors Liquidation Company	\$5,600.00	Partially Unliquidated claims	<i>Under Objection</i>
MR JOCHEN BADERSCHNEIDER JOCHEN BADERSCHNEIDER VEICHTEDERPOINTWEG 33 D 84036 LANDSHUT GERMANY GERMANY	43884	Motors Liquidation Company	\$5,600.00	Partially Unliquidated claims	<i>Under Objection</i>
MRS MARIE GIASI 46 BROADWAY AVE  COLONIA, NJ 07067	4017	Motors Liquidation Company	\$46,284.55	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
NICOLAS PATRICK HARNIST MARIA HARNIST JT TEN 901 BRICKELL KEY BLVD APT 304 MIAMI, FL 33131	44594	Motors Liquidation Company	\$31,055.10	Partially Unliquidated claims	<i>Under Objection</i>
NORMAN GUSSE 1405 LAUREL DRIVE MACEDONIA, OH 44056	5845	Motors Liquidation Company	\$12,907.25	Partially Unliquidated claims	<i>Under Objection</i>
ONEX DEBT OPPORTUNITY FUND, LTD C/O ONEX CREDIT PARTNERS, LLC ATTN MICHAEL I GELBLAT 910 SYLVAN AVENUE SUITE 100 ENGLEWOOD CLIFFS, NJ 07632	67429	Motors Liquidation Company	\$12,212,592.33	Partially Unliquidated claims	<i>Remaining Claim</i>
PALOMINO FUND LTD C/O APPALOOSA MANAGEMENT LP ATTN: KENNETH MAIMAN 51 JOHN F KENNEDY PKWY SHORT HILLS, NJ 07078	66217	Motors Liquidation Company	\$108,415,614.15	Partially Unliquidated claims	<i>Remaining Claim</i>
PERRY PARTNERS INTERNATIONAL INC c/o CITIGROUP GLOBAL MARKETS INC. 390 GREENWICH ST. ATTN: CHETAN BANSAL NEW YORK, NY 10013	66218	Motors Liquidation Company	\$102,691,204.67	Partially Unliquidated claims	<i>Remaining Claim</i>
PERRY PARTNERS LP c/o CITIGROUP GLOBAL MARKETS INC. 390 GREENWICH ST. ATTN: CHETAN BANSAL NEW YORK, NY 10013	66312	Motors Liquidation Company	\$33,208,985.63	Partially Unliquidated claims	<i>Remaining Claim</i>
RED RIVER BUSINESS INC FAO MR G R MACHAN VERITE TRUST CO LTD, PO BOX 36 1ST FL, 37 BROAD ST ST HELIER JERSEY JE4 9NU CHANNEL ISLANDS GREAT BRITAIN	68941	Motors Liquidation Company	\$360,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
REDWOOD MASTER FUND LTD REDWOOD CAPITAL MANAGEMENT LLC ATTN: JONATHAN KOLATCH 910 SYLVAN AVENUE INGLEWOOD, NJ 07632 UNITED STATES OF AMERICA	67430	Motors Liquidation Company	\$14,056,804.16	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
RENATE KUMMER BADISH 10 73776 ALTBACH GERMANY GERMANY	32838	Motors Liquidation Company	\$5,680.00	Partially Unliquidated claims	<i>Under Objection</i>
RODNEY R & DELLA O (DECD) BERTLSHOFFER TTEE 7231 E BROADWAY RD APT 116 MESA, AZ 05208	2883	Motors Liquidation Company	\$48,640.00	Partially Unliquidated claims	<i>Under Objection</i>
ROSWITHA DINGAS WAHRINGERSTRASSE 15/21 A-1090 VIENNA AUSTRIA/EUROPE AUSTRIA	69169	Motors Liquidation Company	\$53,002.95	Partially Unliquidated claims	<i>Under Objection</i>
ROVIGOBANCA CREDITO COOPERATIVO SOC COOP VIA CASALINI 10 ATTN BARBARA COSTA 45100 ROVIGO ITALY ITALY	65980	Motors Liquidation Company	\$9,050,161.79	Partially Unliquidated claims	<i>Under Objection</i>
SANDRA J CONFORTI 854 MARSHALL DR CARLISLE, PA 17013	68603	Motors Liquidation Company	\$20,000.00	Partially Unliquidated claims	<i>Under Objection</i>
SHIRLEY BERNSTEIN-MASON 7737 LA MIRADA DR BOCA RATON, FL 33433	2914	Motors Liquidation Company	\$18,000.00	Partially Unliquidated claims	<i>Under Objection</i>
SILVIA GUELFAND & JOZEF MULLER JT TEN BURGOS 240, DEPTO. 61 LAS CONDES SANTIAGO, CHILE CHILE	19210	Motors Liquidation Company	\$27,500.00	Partially Unliquidated claims	<i>Under Objection</i>
STEVE MUELLER ROSENFELDER RING 52 10315 BERLIN GERMANY GERMANY	36950	Motors Liquidation Company	\$525.96	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
SUTLIFF, DALLAS E 22000 W WICKIE RD  BANNISTER, MI 48807	45066	Motors Liquidation Company	\$200,000.00	Partially Unliquidated claims	<i>Under Objection</i>
THE ADVENT GLOBAL OPPORTUNITY MASTER FUND ADVENT CAPITAL MANAGEMENT LLC ATTN CHUNG TAM 1271 AVENUE OF THE AMERICAS FL 45 NEW YORK, NY 10020	65784	Motors Liquidation Company	\$2,168,304.00	Partially Unliquidated claims	<i>Remaining Claim</i>
THE CANYON VALUE REALIZATION FUND (CAYMAN) LTD C/O CANYON CAPITAL ADVISORS LLC ATTN: JONATHAN KAPLAN ESQ 2000 AVENUE OF THE STARS, 11TH FL LOS ANGELES, CA 90067	69309	Motors Liquidation Company	\$24,582,285.00	Partially Unliquidated claims	<i>Remaining Claim</i>
THE LIVERPOOL LIMITED PARTNERSHIP C/O ELLIOTT MANAGEMENT CORPORATION ATTN: ELLIOT GREENBERG 712 FIFTH AVENUE 35TH FLOOR NEW YORK, NY 10019 UNITED STATES OF AMERICA	66267	Motors Liquidation Company	\$39,532,082.73	Partially Unliquidated claims	<i>Remaining Claim</i>
THOMAS HANRAHAN CGM IRA CUSTODIAN 3 VIDONI PLACE HUNTINGTON, NY 11743	12325	Motors Liquidation Company	\$40,000.00	Partially Unliquidated claims	<i>Under Objection</i>
THOMAS SEILER COMDIRECT BANK AG PASCALLEHRE 15 QUICKBORN GERMANY 25451 GERMANY	23205	Motors Liquidation Company	\$29,000.00	Partially Unliquidated claims	<i>Under Objection</i>
THOROUGHbred FUND LP C/O APPALOOSA MANAGEMENT LP ATTN: KENNETH MAIMAN 51 JOHN F KENNEDY PKWY SHORT HILLS, NJ 07078	66216	Motors Liquidation Company	\$55,652,599.76	Partially Unliquidated claims	<i>Remaining Claim</i>
THOROUGHbred MASTER LTD C/O APPALOOSA MANAGEMENT LP 51 JOHN F KENNEDY PARKWAY ATTN KENNETH MAIMAN SHORT HILLS, NJ 07078	67501	Motors Liquidation Company	\$58,112,123.95	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
UBS AG STEPHEN A THATCHER DIRECTOR & COUNSEL 677 WASHINGTON BLVD 8TH FL STAMFORD, CT 06901 UNITED STATES OF AMERICA	66735	Motors Liquidation Company	\$5,309,262.00	Partially Unliquidated claims	<i>Remaining Claim</i>
UNICREDIT BANCA DI ROMA S.P.A ATTN MR CRISTIANO CARLUCCI VIA U TUPINI 180 00144 ROMA ITALY ITALY	61520	Motors Liquidation Company	\$29,446,989.02	Partially Unliquidated claims	<i>Remaining Claim</i>
WENDALL L WHITE 2520 IH 10 #21 RM 137 BEAUMONT, TX 77703	7407	Motors Liquidation Company	\$50,000.00	Partially Unliquidated claims	<i>Under Objection</i>

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**EXHIBIT E**

**EMPLOYEE CLAIMS**

## Exhibit E - Employee Claims

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
ALFRED CLARK 306 W GREEN VALLEY DR HORSESHOE BEND, AR 72512	61251	Motors Liquidation Company	\$119,256.00	Partially Unliquidated claims	<i>Under Objection</i>
ALFRED DEBUHR 8211 DUNHAM RD DOWNERS GROVE, IL 60516	44646	Motors Liquidation Company	\$212,508.20	Partially Unliquidated claims	<i>Remaining Claim</i>
ANDREW J FORD 5347 BRISTOL PARKE DR CLARKSTON, MI 48348	61162	Motors Liquidation Company	\$46,500.00	Partially Unliquidated claims	<i>Remaining Claim</i>
ANDREWS, MARJORIE C 5920 HERSHINGER CLOSE DULUTH, GA 30097	50569	Motors Liquidation Company	\$25,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BALDWIN STANLEY E 18576 PURLINGBROOK ST LIVONIA, MI 48152	38882	Motors Liquidation Company	\$3,500.00	Partially Unliquidated claims	<i>Under Objection</i>
BARBARA LARSON 803 S 4TH AVE # 4 ALBERT LEA, MN 56007	36233	Motors Liquidation Company	\$65,307.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BARRY CHABALA 43080 AVON RD. CANTON, MI 48187 UNITED STATES OF AMERICA	62005	Motors Liquidation Company	\$172,314.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BASIEWICZ CHESTER A 4884 DAVIS CT TROY, MI 48085	45157	Motors Liquidation Company	\$121,856.00	Partially Unliquidated claims	<i>Under Objection</i>
BLANKENSHIP, BETTY F 65 ELLEN CIR HAMILTON, OH 45011	1925	Motors Liquidation Company	\$361.57	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
BREDE, WILLIAM R 73 HAMPTON HALL BLVD BLUFFTON, SC 29910	64928	Motors Liquidation Company	\$170,380.00	Partially Unliquidated claims	<i>Under Objection</i>
BROWN, LYLE L 527 RETREAT LN GULF SHORES, AL 36542	65111	Motors Liquidation Company	\$122,000.00	Partially Unliquidated claims	<i>Under Objection</i>
BROWN, PATSY K 2299 CAMP HARDTNER RD POLLOCK, LA 71467	20930	Motors Liquidation Company	\$6,637.72	Partially Unliquidated claims	<i>Under Objection</i>
CASTILLO, MARIA H 108 ENECA ST DEFIANCE, OH 43512	61425	Motors Liquidation Company	\$186,120.00	Partially Unliquidated claims	<i>Under Objection</i>
CHERYL ELLERO 18825 BEDFORD DR CLINTON TOWNSHIP, MI 48038	46125	Motors Liquidation Company	\$72,451.00	Partially Unliquidated claims	<i>Under Objection</i>
CHRISTIE, JOHN D 58046 PHEASANT RDG WASHINGTON TOWNSHIP, MI 48094	65664	Motors Liquidation Company	\$1,967,056.00	Partially Unliquidated claims	<i>Under Objection</i>
CHRISTOPHER W GIGNILLIAT PO BOX 314 665 WAYDES BRANCH ROAD CENTERVILLE, TN 37033	37124	Motors Liquidation Company	\$587,286.32	Partially Unliquidated claims	<i>Remaining Claim</i>
CIENKI, JOHN E 6120 LAKE WAY MEWS NORTH RICHLAND HILLS, TX 76180 UNITED STATES OF AMERICA	43403	Motors Liquidation Company	\$148,873.00	Partially Unliquidated claims	<i>Remaining Claim</i>
COLVIN, FRANK L 28862 JEFFERSON AVE ST CLR SHORES, MI 48081	44506	Motors Liquidation Company	\$1,192,000.00	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
CONRAD WILHELM 1108 ORIOLE CIR  FILLMORE, CA 93015	30239	Motors Liquidation Company	\$513.76	Partially Unliquidated claims	<i>Under Objection</i>
CRAIG MCMILLEN 4457 WILLOW CREEK SE  WARREN, OH 44484	45965	Motors Liquidation Company	\$91,655.00	Partially Unliquidated claims	<i>Remaining Claim</i>
CRAIG SOBOL 557 WILDFLOWER TRAIL  MYRTLE SEACH, SC 29579 UNITED STATES OF AMERICA	61273	Motors Liquidation Company	\$32,895.31	Partially Unliquidated claims	<i>Remaining Claim</i>
CRIS SMITH 9095 APPLE ORCHARD  FENTON, MI 48430 UNITED STATES OF AMERICA	30003	Motors Liquidation Company	\$84,289.00	Partially Unliquidated claims	<i>Remaining Claim</i>
DAVID DURRANT 3164 DANBURY DR W  JANESVILLE, WI 53546	30960	Motors Liquidation Company	\$149,263.00	Partially Unliquidated claims	<i>Remaining Claim</i>
DAWSON, GEORGE C 745 SW ROBINHOOD DR  DALLAS, OR 97338 UNITED STATES OF AMERICA	43414	Motors Liquidation Company	\$523,098.72	Partially Unliquidated claims	<i>Remaining Claim</i>
DONNA TURNER 1741 FM 450 N  HALLSVILLE, TX 75650 UNITED STATES OF AMERICA	20604	Motors Liquidation Company	\$156,068.00	Partially Unliquidated claims	<i>Remaining Claim</i>
E MICHAEL MUTCHLER 6000 ROYAL MARCO WAY #553  MARCO ISLAND, FL 34145	15171	Motors Liquidation Company	\$1,659,000.00	Partially Unliquidated claims	<i>Under Objection</i>
EASON, ELDON R 2006 STAFFORD DR  ARLINGTON, TX 76012	25260	Motors Liquidation Company	\$226,596.00	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
EDWARD CORBETT 351 MAINSAIL DR  HAMPTON, VA 23664	63496	Motors Liquidation Company	\$36,098.00	Partially Unliquidated claims	<i>Under Objection</i>
ESTA PERDUE 715 S PORTLAND ST  BRYAN, OH 43506	5722	Motors Liquidation Company	\$2,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
FERGUSON, CLIFFORD W 6319 WOODMERE CT  FLINT, MI 48532	44113	Motors Liquidation Company	\$423,354.00	Partially Unliquidated claims	<i>Under Objection</i>
FORAKER JR, DAVID E 10 ANTRIM DELLS  SPRINGBORO, OH 45066	44072	Motors Liquidation Company	\$172,054.00	Partially Unliquidated claims	<i>Under Objection</i>
FRANK GAMBINO 2449 CEDAR KEY DR  LAKE ORION, MI 48360	65356	Motors Liquidation Company	\$148,502.00	Partially Unliquidated claims	<i>Remaining Claim</i>
FRED LUNDGAARD 69525 RIVERBEND LN  ARMADA, MI 48005	29997	Motors Liquidation Company	\$42,794.00	Partially Unliquidated claims	<i>Remaining Claim</i>
GARY OSBORN 3436 BLOSSOM LN  BLOOMFIELD, MI 48302	63178	Motors Liquidation Company	\$35,867.00	Partially Unliquidated claims	<i>Remaining Claim</i>
GEORGE SCHNEIDER 1105 E FAIRVIEW LANE  ROCHESTER HILLS, MI 48306	63053	Motors Liquidation Company	\$40,634.00	Partially Unliquidated claims	<i>Remaining Claim</i>
GEORGE W MCCLAIN 3022 IMPERIAL VALLEY DRIVE  LITTLE ROCK, AR 72212	21851	Motors Liquidation Company	\$43,097.00	Partially Unliquidated claims	<i>Under Objection</i>

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Exhibit E - Employee Claims

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
Gerald Morris 4625 Compeau Road  Alpena, MI 49707 UNITED STATES OF AMERICA	28290	Motors Liquidation Company	\$108,752.00	Partially Unliquidated claims	<i>Remaining Claim</i>
GOIDEL, LOU P 245 SKAGGS CREEK RD  GLASGOW, KY 42141	24060	Motors Liquidation Company	\$191,090.00	Partially Unliquidated claims	<i>Remaining Claim</i>
GOMES, FRANCISCO P RUA DR AQUILINO RIBEIRO BLOCO ESQUERDO RES-DO-CHAO PAREDES DE COURA, PORTUGAL 4940533 PORTUGAL	16890	Motors Liquidation Company	\$694.06	Partially Unliquidated claims	<i>Under Objection</i>
GROSSKLAUS, TIMOTHY A 22220 EAST RIVER ROAD  GROSSE ILE, MI 48138	23107	Motors Liquidation Company	\$5,000.00	Partially Unliquidated claims	<i>Under Objection</i>
HERR BARRY E 6013 LAKE BREEZE RD  GROVE, OK 74344	68130	Motors Liquidation Company	\$1,171,956.00	Partially Unliquidated claims	<i>Under Objection</i>
HESS, DOUGLAS M 8 SYCAMORE LN  GROSSE POINTE, MI 48230	36927	Motors Liquidation Company	\$35,194.00	Partially Unliquidated claims	<i>Remaining Claim</i>
IRMA Y VELIZ 12565 PETALUMA RD  VICTORVILLE, CA 92392	26683	Motors Liquidation Company	\$335,153.36	Partially Unliquidated claims	<i>Remaining Claim</i>
JAMES MARCIA S 1941 W LEONARD RD  LEONARD, MI 48367	65137	Motors Liquidation Company	\$108,814.00	Partially Unliquidated claims	<i>Under Objection</i>
JAMES PALMIERI 17701 HERON LN  FORT MYERS, FL 33908	26964	Motors Liquidation Company	\$23,292.00	Partially Unliquidated claims	<i>Under Objection</i>

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Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
JAMES WELTON 800 PEACHTREE LANE  ROCHESTER HILLS, MI 48306 UNITED STATES OF AMERICA	22671	Moters Liquidation Company	\$58,728.00	Partially Unliquidated claims	<i>Under Objection</i>
JAMES WHITESEL 2650 SOLAR DR  LAKE ORION, MI 48360	23050	Moters Liquidation Company	\$238,701.80	Partially Unliquidated claims	<i>Under Objection</i>
JAMES WHITESEL 2650 SOLAR DRIVE  LAKE ORION, MI 48360	23178	Moters Liquidation Company	\$238,701.80	Partially Unliquidated claims	<i>Under Objection</i>
JOANNE J. GROSE 503 ASHMEDE CT.  ARLINGTON, TX 76013	33345	Moters Liquidation Company	\$16,937.00	Partially Unliquidated claims	<i>Under Objection</i>
JOHN ENGLAND 3575 STATE ROUTE 305  SOUTHINGTON, OH 44470 UNITED STATES OF AMERICA	61081	Moters Liquidation Company	\$16,397.00	Partially Unliquidated claims	<i>Remaining Claim</i>
JOLLY, THOMAS G 2839 BIRCHWOOD ST  TRENTON, MI 48183	48391	Moters Liquidation Company	\$204,667.19	Partially Unliquidated claims	<i>Remaining Claim</i>
JONATHAN BRIENZA 411 WALNUT STREET UNIT # 3964 GREEN COVE SPRINGS, FL 32043	30763	Moters Liquidation Company	\$98,568.00	Partially Unliquidated claims	<i>Remaining Claim</i>
KATKO JR, CHARLES 187 GREENAN LN  LAKE ORION, MI 48362	22663	Moters Liquidation Company	\$280,275.00	Partially Unliquidated claims	<i>Under Objection</i>
LARRY L SNAPP 6610 GASPARILLA PINE BLVD #112  ENGLEWOOD, FL 34224	63412	Moters Liquidation Company	\$57,722.00	Partially Unliquidated claims	<i>Remaining Claim</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
LARRY LEIDLEIN 3841 WINDING PINE METAMORA, MI 48455	32750	Motors Liquidation Company	\$210,966.00	Partially Unliquidated claims	<i>Under Objection</i>
LENZ, MARSHA L 13508 S RED COAT DR LEMONT, IL 60439	44480	Motors Liquidation Company	\$37,031.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LEON CRUMP PO BOX 55523 OKLAHOMA CITY, OK 73155	49693	Motors Liquidation Company	\$89,089.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LEONARD J PILZ 10221 ROOD AVE LAKE, MI 48632	22313	Motors Liquidation Company	\$35,203.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LESLYN C BLACK 2480 LEISURE WORLD MESA, AZ 85206	27554	Motors Liquidation Company	\$135,766.79	Partially Unliquidated claims	<i>Remaining Claim</i>
LESLYN C BLACK 2480 LEISURE WORLD MESA, AZ 85206	27555	Motors Liquidation Company	\$15,181.94	Partially Unliquidated claims	<i>Remaining Claim</i>
LINDA SALMON 1681 CARNELIAN CT LINCOLN, CA 95648	22891	Motors Liquidation Company	\$174,075.00	Partially Unliquidated claims	<i>Under Objection</i>
LOHMAN V BLUE JR C/O FORTSON, BENTLEY & GRIFFIN, PA 2500 DANIELL'S BRIDGE RD BLDG 200, STE 3A ATHENS, GA 30606	23153	Motors Liquidation Company	\$136,303.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LOHNER, ANN M 3661 TIMBERLANE DR EASTON, PA 18045	36739	Motors Liquidation Company	\$292.56	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

## Exhibit E - Employee Claims

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
LOMBARDO, DENNIS M 4730 CECELIA ANN CT CLARKSTON, MI 48346	61379	Motors Liquidation Company	\$119,792.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MALINDA CORNELIUS 6430 LIBERTY VALLEY DR KATY, TX 77449	36149	Motors Liquidation Company	\$4,000.00	Partially Unliquidated claims	<i>Under Objection</i>
MALINDA CORNELIUS 6430 LIBERTY VALLEY DR KATY, TX 77449	36150	Motors Liquidation Company	\$4,000.00	Partially Unliquidated claims	<i>Under Objection</i>
MANOS, KATHERINE 12125 SPARTAN WAY APT 102 BAYONET POINT, FL 34667	19384	Motors Liquidation Company	\$76,200.00	Partially Unliquidated claims	<i>Under Objection</i>
MARIE V PILZ SPOUSE OF LEONARD J PILZ (RETIREE) C/O LEONARD J PILZ 10221 ROOD AVE LAKE, MI 48632	22304	Motors Liquidation Company	\$117,300.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MARWIN HENRY R 3096 MYDDLETON DRIVE TROY, MI 48084	45177	Motors Liquidation Company	\$112,644.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MATHEWS MD 3973 KNOX AVE ROSAMOND, CA 93560 UNITED STATES OF AMERICA	62405	Motors Liquidation Company	\$36,398.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MAX MILLER JR 6299 QUAIL STREET HASLETT, MI 48840	61276	Motors Liquidation Company	\$144,813.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MC GARRY RAYMOND G 2932 BIRNAM CT OAKLAND TOWNSHIP, MI 48306	27132	Motors Liquidation Company	\$163,836.00	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
MILLER JR DALE F 4333 LIVE OAK BLVD FORT WAYNE, IN 46804	36556	Motors Liquidation Company	\$144,039.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MOORE, ODELL 844 BOUTELL DR GRAND BLANC, MI 48439	51048	Motors Liquidation Company	\$178,531.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MOYER, BARRY R 404 RIVERS EDGE LN PORTLAND, MI 48875	65660	Motors Liquidation Company	\$51,263.47	Partially Unliquidated claims	<i>Under Objection</i>
MUJUMDAR, JAYANT S 21183 E CHIGWIDDEN ST NORTHVILLE, MI 48167	65350	Motors Liquidation Company	\$142,413.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NANCY GRUBBA 6419 WOODBURNE CT. GRAND BLANC, MI 48439 UNITED STATES OF AMERICA	44263	Motors Liquidation Company	\$122,902.00	Partially Unliquidated claims	<i>Under Objection</i>
NEIL DODRILL 3228 COREY RD TOLEDO, OH 43615	23439	Motors Liquidation Company	\$152,513.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NELSON, MARIANNE 8839 DILL DR STERLING HEIGHTS, MI 48312	44226	Motors Liquidation Company	\$3,500.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NORMAN CLAERR 12956 HUMMINGBIRD RIDGE DAVISBURG, MI 48350	61562	Motors Liquidation Company	\$41,560.00	Partially Unliquidated claims	<i>Remaining Claim</i>
PAUL DAY 7922 JENNIFER LN BROWNSBURG, IN 46112	63758	Motors Liquidation Company	\$110,852.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
PAUL FRIIS 13201 PINEHURST LANE  GRAND BLANC, MI 48439 UNITED STATES OF AMERICA	69693	Remediation And Liability Management Company, Inc.	\$76,769.00	Partially Unliquidated claims	<i>Remaining Claim</i>
PAUL FRIIS 13201 PINEHURST LANE  GRAND BLANC, MI 48439	69852	Remediation And Liability Management Company, Inc.	\$76,769.00	Partially Unliquidated claims	<i>Under Objection</i>
PAUL, EDGAR B 1 QUAIL HOLLOW RD  MURFREESBORO, NC 27855	62257	Motors Liquidation Company	\$372,063.72	Partially Unliquidated claims	<i>Remaining Claim</i>
PAYNE, PATRICIA A 3090 RHODA ST  FLINT, MI 48507	14746	Motors Liquidation Company	\$27,900.00	Partially Unliquidated claims	<i>Remaining Claim</i>
PHELEY, GARY N 3662 HONORS WAY  HOWELL, MI 48843	60934	Motors Liquidation Company	\$146,253.00	Partially Unliquidated claims	<i>Under Objection</i>
PREMO, DOUGLAS C 31 RIVERSIDE PKWY  MASSENA, NY 13662	30777	Motors Liquidation Company	\$135,908.00	Partially Unliquidated claims	<i>Remaining Claim</i>
RABY, SANDRA D 2651 N EAST SHORE  BIRCHWOOD, WI 54817	11619	Motors Liquidation Company	\$21,723.01	Partially Unliquidated claims	<i>Remaining Claim</i>
RAYMOND DELOZIER 5051 N HWY A1A APT PH2-4 FT PIERCE, FL 34949	61885	Motors Liquidation Company	\$145,660.00	Partially Unliquidated claims	<i>Under Objection</i>
RICHARD M POWERS P O BOX 29  COPPER HARBOR, MI 49918	46007	Motors Liquidation Company	\$62,865.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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## Exhibit E - Employee Claims

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
ROBERT & CHERYL CLICK 3028 PINNACLE CT.  CLERMONT, FL 34711 UNITED STATES OF AMERICA	20190	Motors Liquidation Company	\$108,903.00	Partially Unliquidated claims	<i>Remaining Claim</i>
ROBERT GRUBBA 6419 WOODBURNE CT.  GRAND BLANC, MI 48439 UNITED STATES OF AMERICA	44262	Motors Liquidation Company	\$126,456.00	Partially Unliquidated claims	<i>Under Objection</i>
ROBERT SCHIEB 5317 LAKE FOREST RESERVE LN  BRUNSWICK, OH 44212 UNITED STATES OF AMERICA	62375	Motors Liquidation Company	\$138,728.00	Partially Unliquidated claims	<i>Remaining Claim</i>
ROBERT TRIPOLSKY 43440 HERRING DR  CLINTON TWP, MI 48038	44442	Motors Liquidation Company	\$152,878.00	Partially Unliquidated claims	<i>Under Objection</i>
RUSS TOWNER 204 S CREEDMOOR WAY  ANDERSON, IN 46011	21322	Motors Liquidation Company	\$70,344.00	Partially Unliquidated claims	<i>Remaining Claim</i>
RUSSELL TOWNER 204 S CREEDMOOR WAY  ANDERSON, IN 46011	21321	Motors Liquidation Company	\$702,080.00	Partially Unliquidated claims	<i>Under Objection</i>
SEWELL, CAROLYN S 2121 WINSLOW AVE  FLOWER MOUND, TX 75028	70727	Motors Liquidation Company	\$37,800.00	Partially Unliquidated claims	<i>Remaining Claim</i>
SHEIPE, ROBERT 484 E CARMEL DR PMB 311  CARMEL, IN 46032	46269	Motors Liquidation Company	\$144,389.00	Partially Unliquidated claims	<i>Under Objection</i>
SIDNEY EISENBERG 3406 VANTAGE POINTE DR  ROWLAND HEIGHTS, CA 91748	21666	Motors Liquidation Company	\$144,420.00	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
SORTZI, BRYAN K 57292 PLYMOUTH RD WASHINGTON, MI 48094	23372	Motors Liquidation Company	\$89,460.00	Partially Unliquidated claims	<i>Remaining Claim</i>
SPRANGER, ROY C 11421 MASONIC BLVD WARREN, MI 48093	27900	Motors Liquidation Company	\$137,633.00	Partially Unliquidated claims	<i>Remaining Claim</i>
STAPLETON LOYD K 9168 GLENRIDGE BLVD CENTERVILLE, OH 45458	64397	Motors Liquidation Company	\$144,352.00	Partially Unliquidated claims	<i>Under Objection</i>
STEVE MATSIL 4701 BONNIE CT WEST BLOOMFIELD, MI 48322 UNITED STATES OF AMERICA	32798	Motors Liquidation Company	\$1,640,600.00	Partially Unliquidated claims	<i>Remaining Claim</i>
SUSAN L VAN COTT 12389 AVENIDA CONSENTIDO SAN DIEGO, CA 92128	46257	Motors Liquidation Company	\$202,900.00	Partially Unliquidated claims	<i>Remaining Claim</i>
TERRY MCCLAIN 11317 WAY CROSS RD OKLAHOMA CITY, OK 73162	50083	Motors Liquidation Company	\$127,098.00	Partially Unliquidated claims	<i>Remaining Claim</i>
THOMAS ENDRES 4294 DOMINION BLVD BRIGHTON, MI 48114	48423	Motors Liquidation Company	\$515,235.00	Partially Unliquidated claims	<i>Remaining Claim</i>
THOMAS MANCEWICZ 2300 HILLCRESCENT TROY, MI 48085	61699	Motors Liquidation Company	\$26,524.00	Partially Unliquidated claims	<i>Remaining Claim</i>
THOMAS WILSON BOX 20 BANGLAMUNG POST OFFICE 20150 CHONBURI THAILAND THAILAND	31183	Motors Liquidation Company	\$315,528.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
THOMAS ZEBHAZY 3364 W YORK CT  ROCHESTER HILLS, MI 48306	61400	Motors Liquidation Company	\$137,024.00	Partially Unliquidated claims	<i>Under Objection</i>
UPDEGRAFF, DALE E 2346 WESTDALE CT  KOKOMO, IN 46901	20827	Motors Liquidation Company	\$70,000.00	Partially Unliquidated claims	<i>Under Objection</i>
VAN COTT, PETER 12389 AVENIDA CONSENTIDO  SAN DIEGO, CA 92128	46259	Motors Liquidation Company	\$133,775.00	Partially Unliquidated claims	<i>Remaining Claim</i>
VANDERWALL, DAVID J 737 WILLINGTON WAY  THE VILLAGES, FL 32162	31311	Motors Liquidation Company	\$154,180.00	Partially Unliquidated claims	<i>Remaining Claim</i>
VESTY, JOHN P 250 MARMOOR CT  ROCHESTER HILLS, MI 48309	44406	Motors Liquidation Company	\$33,147.00	Partially Unliquidated claims	<i>Remaining Claim</i>
WIGGINS, JUDY M 2892 CHURCHILL DR  KINSTON, NC 28504	48388	Motors Liquidation Company	\$134,673.00	Partially Unliquidated claims	<i>Remaining Claim</i>
WILLIAM A HEIDORN 5420 WILLOW SPRINGS RD  LA GRANGE HIGHLANDS, IL 60525	29698	Motors Liquidation Company	\$72,415.00	Partially Unliquidated claims	<i>Remaining Claim</i>
WILLIAM SIMMONS 2935 TIMBER LANE  JANESVILLE, WI 53548 UNITED STATES OF AMERICA	25422	Motors Liquidation Company	\$4,531.00	Partially Unliquidated claims	<i>Under Objection</i>
WILLIAM SIMMONS 2935 TIMBER LANE  JANESVILLE, WI 53548	25425	Motors Liquidation Company	\$10,487.00	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

## Exhibit E - Employee Claims

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
WILSON, MARLIN 6668 N BLUE RIVER RD ARLINGTON, IN 46104	49536	Motors Liquidation Company	\$1,486.93	Partially Unliquidated claims	<i>Under Objection</i>
ZITZLER, JEAN 858 TARRANT DR FONTANA, WI 53125	28312	Motors Liquidation Company	\$7,207.20	Partially Unliquidated claims	<i>Under Objection</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**EXHIBIT F**

**EQUITY SECURITY HOLDERS CLAIMS**

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
BRUCE D MULLEN 13 LAWRENCE PL  PLYMOUTH MEETING, PA 19462	68325	Motors Liquidation Company	\$4,200.00	Partially Unliquidated claims	<i>Under Objection</i>
CATHERINE C GRAHAM WBNA CUSTODIAN ROTH IRA 2563 RIVER KNOLL DR LILBURN, GA 30047	4100	Motors Liquidation Company	\$4,476.69	Partially Unliquidated claims	<i>Under Objection</i>
CLOWNEY, WILLIAM H 164 BERESFORD ST  HIGHLAND PARK, MI 48203	3025	Motors Liquidation Company	\$2,500.00	Partially Unliquidated claims	<i>Under Objection</i>
CLYDE & CLAIRENE STRILER 4136 W COLDWATER RD  FLINT, MI 48504	4854	Motors Liquidation Company	\$12,500.00	Partially Unliquidated claims	<i>Under Objection</i>
CLYDE & CLAIRENE STRILER TTEE'S CLYDE & CLAIRENE STRILER REV LIV TRUST UAD 8/07/02 4136 W. COLDWATER RD. FLINT, MI 48504	4855	Motors Liquidation Company	\$12,500.00	Partially Unliquidated claims	<i>Under Objection</i>
DAVID AND SANDRA MOSKOVITZ 1514 SW 149TH AVE  PEMBROKE PINES, FL 33027	68651	Motors Liquidation Company	\$2,500.00	Partially Unliquidated claims	<i>Under Objection</i>
DE BUSSEY, LAWRENCE L 7093 BALTIC DR SW  BYRON CENTER, MI 49315	63072	Motors Liquidation Company	\$11,590.88	Partially Unliquidated claims	<i>Under Objection</i>
DOMENICA DITTMEIER 32 SHELLEY AVE  VALHALLA, NY 10595 UNITED STATES OF AMERICA	70494	Motors Liquidation Company	\$20,000.00	Partially Unliquidated claims	<i>Under Objection</i>
DOMENICA S DITTMEIER 32 SHELLEY AVE  VALHALLA, NY 10595	70498	Motors Liquidation Company	\$20,000.00	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
DR ROBERT EBERLEIN RUA VITORIA M6 APT0 132 CEP 09030 520 SANTO ANDRE SP BRAZIL BRAZIL	31228	Motors Liquidation Company	\$2,087.25	Partially Unliquidated claims	<i>Under Objection</i>
EKREM BAKA AN DER UNTERGEIS 3 36251 BAD HERSFELD GERMANY GERMANY	69591	Motors Liquidation Company	\$20,000.00	Partially Unliquidated claims	<i>Under Objection</i>
GOETZ G WILL AM MEILENHOFEN WEG 6 92348 BERG GERMANY GERMANY	46081	Motors Liquidation Company	\$15,645.00	Partially Unliquidated claims	<i>Under Objection</i>
GUY & JUANITA RAMSAUR PO BOX 338  IRON STATION, NC 28080	25384	Motors Liquidation Company	\$25,000.00	Partially Unliquidated claims	<i>Under Objection</i>
HELMUT LITZENBERG ST JOHANN 6 - APP 185 D-91056 ERLANGEN GERMANY GERMANY	29638	Motors Liquidation Company	\$4,200.00	Partially Unliquidated claims	<i>Under Objection</i>
JAMES R LEONARD (IRA) FCC AS CUSTODIAN PO BOX 82367 LAFAYETTE, LA 70598	15380	Motors Liquidation Company	\$25,000.00	Partially Unliquidated claims	<i>Under Objection</i>
JANICE UNDERWOOD 5518 EAST TIMBERVIEW CT  WILMINGTON, DE 19805	16169	Motors Liquidation Company	\$3,046.50	Partially Unliquidated claims	<i>Under Objection</i>
MARGARETE KOWARZIK STRUNDENER STRASSE 86 A D-51069 KOLN GERMANY GERMANY	27207	Motors Liquidation Company	\$1,805.60	Partially Unliquidated claims	<i>Under Objection</i>
MARTIN IMMKE ZILLESTR. 99C 10585 BERLIN GERMANY GERMANY	32757	Motors Liquidation Company	\$3,795.34	Partially Unliquidated claims	<i>Under Objection</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
MARTIN KOHN OLOF PALME STR 7 D-60439 FRANKFURT GERMANY GERMANY	30195	Motors Liquidation Company	\$1,700.00	Partially Unliquidated claims	<i>Under Objection</i>
MOHAMMED REZAUL HUSSAIN 4318 WALNUT STREET APT 2-R PHILADELPHIA, PA 19104	7678	Motors Liquidation Company	\$4,833.66	Partially Unliquidated claims	<i>Under Objection</i>
MUSSELL, JOHN A 9783 ALLEN ST  GOWANDA, NY 14070	2598	Motors Liquidation Company	\$2,500.00	Partially Unliquidated claims	<i>Under Objection</i>
NELLY BAUER-ROLLANDIN & FRANK OUW ROMERSTR 3A 76870 KANDEL, GERMANY GERMANY	64784	Motors Liquidation Company	\$10,702.08	Partially Unliquidated claims	<i>Under Objection</i>
NORMAN B. THOT ANGERSTRASSE 11A 40878 RATINGEN GERMANY GERMANY	15192	Motors Liquidation Company	\$1,522.48	Partially Unliquidated claims	<i>Under Objection</i>
PLOUFFE, DANIEL C 70 FONTANA LN  GROSSE POINTE SHORES, MI 48236	45171	Motors Liquidation Company	\$162,320.00	Partially Unliquidated claims	<i>Under Objection</i>
PRIER OTTO WEIDSTRASSE NR 5 55120 MAINZ GERMANY GERMANY	64054	Motors Liquidation Company	\$166.14	Partially Unliquidated claims	<i>Under Objection</i>
ROBERT P SPROED CGM IRA CUSTODIAN 10444 WESTLAND LANE DAYTON, OR 97114	13667	Motors Liquidation Company	\$10,185.00	Partially Unliquidated claims	<i>Under Objection</i>
RUDOLF DITTRICH DIESTELWEG 30 28816 STUHR GERMANY GERMANY	30953	Motors Liquidation Company	\$3,584.45	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Exhibit F - Equity Security Holders Claims

Motors Liquidation Company, et al.

Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
SHUN-PING CHEN AUF DER OHE 15 BARMSTEDT GERMANY D-25355 GERMANY	27148	Motors Liquidation Company	\$2,356.70	Partially Unliquidated claims	<i>Under Objection</i>
SOLANDINE, DIXIE H 1845 BARTH AVE  INDIANAPOLIS, IN 46203	64023	Motors Liquidation Company	\$7,500.00	Partially Unliquidated claims	<i>Under Objection</i>
STOLPIN, ROGER M 3136 QUICK RD  HOLLY, MI 48442	61371	Motors Liquidation Company	\$1,080.00	Partially Unliquidated claims	<i>Under Objection</i>
SULHDOST LISA OTTO-BRAUNSTR 19 40595 DUSSELDORF GERMANY GERMANY	61220	Motors Liquidation Company	\$2,809.00	Partially Unliquidated claims	<i>Under Objection</i>
SUPPER, REINHARD AM HORSTENSTEIN 24B 12277 BERLIN GERMANY GERMANY	26742	Motors Liquidation Company	\$148.63	Partially Unliquidated claims	<i>Under Objection</i>
THANH PHUC THI 48-19 208TH STREET  BAYSIDE, NY 11364	70673	Motors Liquidation Company	\$4,112.50	Partially Unliquidated claims	<i>Remaining Claim</i>
THORSTEN JUNG SEESTRASSE 4 56459 POTTUM GERMANY GERMANY	46611	Motors Liquidation Company	\$27,640.00	Partially Unliquidated claims	<i>Under Objection</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

**EXHIBIT G**

**EXECUTORY CONTRACTS CLAIMS**

Partially Unliquidated Claims Estimation Motion

## Exhibit G - Executory Contracts Claims

Motors Liquidation Company, et al.

Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
ACD HOLDINGS LLC ATTN JOHN B T CAMBELL C/O ROBERT A BALL ESQ 225 BROADWAY STE 2220 SAN DIEGO, CA 92101	14342	MLCS, LLC	\$3,303,266.27	Partially Unliquidated claims	<i>Remaining Claim</i>
ACD HOLDINGS LLC C/O ROBERT A BALL, ESQ ATTN JOHN BT CAMBELL 225 BROADWAY STE 2220 SAN DIEGO, CA 92101	14343	MLCS, LLC	\$1,877,222.88	Partially Unliquidated claims	<i>Remaining Claim</i>
ACD HOLDINGS LLC C/O ROBERT A BALL, ESQ ATTN JOHN BT CAMBELL 225 BROADWAY STE 2220 SAN DIEGO, CA 92101	14344	MLCS, LLC	\$1,287,237.51	Partially Unliquidated claims	<i>Remaining Claim</i>
ACD HOLDINGS LLC C/O ROBERT A BALL, ESQ ATTN JOHN B CAMBELL 225 BROADWAY STE 2220 SAN DIEGO, CA 92101	14345	MLCS, LLC	\$1,856,592.36	Partially Unliquidated claims	<i>Remaining Claim</i>
ANGELA BROWN C/O GREGORY P CAFOUROS KROGER GARDIS & REGAS LLP 111 MONUMENT CIRCLE STE 900 INDIANAPOLIS, IN 46204	49487	Motors Liquidation Company	\$15,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
APRIL PERRY C/O GREGORY P CAFOUROS, KROGER, GARDIS & REGAS, LLP 111 MONUMENT CIRCLE, SUITE 900 INDIANAPOLIS, IN 46204 UNITED STATES OF AMERICA	51133	Motors Liquidation Company	\$15,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
ATEL LEASING CORPORATION, AS AGENT ATTN V MORAIS OR R WILDER 600 CALIFORNIA STREET, 6TH FLOOR SAN FRANCISCO, CA 94108	70438	Motors Liquidation Company	\$116,180.00	Partially Unliquidated claims	<i>Under Objection</i>
BP/CGCENTER I LLC C/O DOUGLAS B ROSNER ESQ GOULSTON & STORRS PC 400 ATLANTIC AVE BOSTON, MA 02110	61073	Motors Liquidation Company	\$21,459,850.92	Partially Unliquidated claims	<i>Remaining Claim</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Partially Unliquidated Claims Estimation Motion

## Exhibit G - Executory Contracts Claims

Motors Liquidation Company, et al.

Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
C THOMPSON AUTOMOTIVE INC PO BOX 358  GREENWOOD, SC 29648	63533	Motors Liquidation Company	\$266,024.89	Partially Unliquidated claims	<i>Remaining Claim</i>
CARDENAS MOTORS, INC. RENATO CARDENAS 1500 N EXPY 83 BROWNSVILLE, TX 78521	11064	Motors Liquidation Company	\$6,622,155.95	Partially Unliquidated claims	<i>Under Objection</i>
CAROL L CLARK 162 WARREN STREET APT 2  GLENS FALLS, NY 12801	786	Motors Liquidation Company	\$24,685.16	Partially Unliquidated claims	<i>Remaining Claim</i>
CISCO SYSTEMS CAPITAL CORPORATION LAWRENCE SCHWAB/THOMAS GAA BIALSON BERGEN & SCHWAB 2600 EL CAMINO REAL STE300 PALO ALTO, CA 94306	47941	Motors Liquidation Company	\$379,236.00	Partially Unliquidated claims	<i>Remaining Claim</i>
CITY OF LOS ANGELES LOS ANGELES WORLD AIRPORTS ATTENTION MICHAEL TY ESQ 1 WORLD WAY  LOS ANGELES, CA 90045	70216	Remediation And Liability Management Company, Inc.	\$6,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
COMPUTER ASSOCIATES INTERNATIONAL, INC. PLATINUM TECHNOLOGY INTERNATIONAL, INC. ATTN ROBERT AUSTEN 1 CA PLZ ISLANDIA, NY 11749	20703	Motors Liquidation Company	\$3,329,143.36	Partially Unliquidated claims	<i>Remaining Claim</i>
CROWN ENTERPRISES INC C/O MARILYN MITCHELL 12225 STEPHENS RD WARREN, MI 48089	69961	Motors Liquidation Company	\$1,782,742.00	Partially Unliquidated claims	<i>Under Objection</i>
CROWN ENTERPRISES INC C/O MARILYN MITCHELL 12225 STEPHENS RD WARREN, MI 48089	69974	Motors Liquidation Company	\$1,782,742.00	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

## Exhibit G - Executory Contracts Claims

Motors Liquidation Company, et al.

Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
DANA HOLDING CORPORATION AND ITS SUBSIDIARIES AND AFFILIATES ATTN LISA WURSTER 3939 TECHNOLOGY DRIVE MAUMEE, OH 43537	65896	Motors Liquidation Company	\$10,034.72	Partially Unliquidated claims	<i>Remaining Claim</i>
ENTERPRISE HOLDINGS INC (F/K/A ENTERPRISE RENT A CAR COMPANY) ATTN THOMAS P LAFFEY 600 CORPORATE PARK DRIVE ST LOUIS, MO 63105	65719	Motors Liquidation Company	\$761,015.75	Partially Unliquidated claims	<i>Remaining Claim</i>
FIRST UNITED INC. ATTN: DAVID WICK 5440 MOOREHOUSE DRIVE SUITE 4000 SAN DIEGO, CA 92121 UNITED STATES OF AMERICA	70401	Motors Liquidation Company	\$4,337,777.00	Partially Unliquidated claims	<i>Remaining Claim</i>
HAIN CAPITAL HOLDINGS, LLC re: FOUNTAIN LAKES I LLC ATTN GANNA LIBERCHUK 301 ROUTE 17, 7TH FLOOR RUTHERFORD, NJ 07070	69788	Motors Liquidation Company	\$923,334.60	Partially Unliquidated claims	<i>Remaining Claim</i>
HUB PROPERTIES TRUST C/O REIT MANAGEMENT & RESEARCH LLC 400 CENTRE STREET NEWTON, MA 02458	20942	Motors Liquidation Company	\$83,314.93	Partially Unliquidated claims	<i>Remaining Claim</i>
INTEVA PRODUCTS LLC ATTN GENERAL COUNSEL 1401 CROOKS ROAD TROY, MI 48084	66269	Motors Liquidation Company	\$120,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
JAMES A AND VICKY L BEEDIE C/O GREGORY P CAFOUROS KROGER GARDIS & REGAS LLP 111 MONUMENT CIRC STE 900 INDIANAPOLIS, IN 46204	49486	Motors Liquidation Company	\$2,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
JERRY AND JANIS MCPIKE C/O GREGORY P CAFOUROS, KROGER, GARDIS & REGAS, LLP 111 MONUMENT CIRCLE, SUITE 900 INDIANAPOLIS, IN 46204 UNITED STATES OF AMERICA	51136	Motors Liquidation Company	\$75,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

## Exhibit G - Executory Contracts Claims

Motors Liquidation Company, et al.

Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
JOHN J QUINLAN 1030 S SUPERIOR ST  ANTIGO, WI 54409	64509	Motors Liquidation Company	\$1,050,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LARRY D & KATHERINE A CRANE C/O GREGORY P CAFOUROS KROGER GARDIS & REGAS LLP 111 MONUMENT CIRCLE STE 900 INDIANAPOLIS, IN 46204	49488	Motors Liquidation Company	\$2,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LARRY DIXON C/O GREGORY P CAFOUROS KROGER GARDIS & REGAS LLP 111 MONUMENT CIRCLE STE 900 INDIANAPOLIS, IN 46204	49489	Motors Liquidation Company	\$36,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LAWANDA ASBELL AND JAMES HAMMOND C/O GREGORY P CAFOUROS KROGER GARDIS & REGAS LLP 111 MONUMENT CIR STE 900 INDIANAPOLIS, IN 46204	49484	Motors Liquidation Company	\$1,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LINDEN DEVELOPMENT LLC C/O LOUIS F SOLIMINE THOMPSON HINE LLP 312 WALNUT ST STE 1400 CINCINNATI, OH 45202	70290	Motors Liquidation Company	\$6,600,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
LUCINDA WESSEL C/O GREGORY P CAFOUROS, KROGER, GARDIS & REGAS, LLP 111 MONUMENT CIRCLE, SUITE 900 INDIANAPOLIS, IN 46204 UNITED STATES OF AMERICA	51134	Motors Liquidation Company	\$15,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MARJORIE L MARTIN C/O GREGORY P CAFOUROS KROGER GARDIS & REGAS LLP 111 MONUMENT CIR STE 900 INDIANAPOLIS, IN 46204	49483	Motors Liquidation Company	\$500.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MTECH ASSOCIATES LLC C/O KATHLEEN H. KLAUS MADDIN HAUSER 28400 NORTHWESTERN HIGHWAY 3RD FLOOR SOUTHFIELD, MI 48034 UNITED STATES OF AMERICA	70536	Motors Liquidation Company	\$6,051,597.62	Partially Unliquidated claims	<i>Remaining Claim</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Partially Unliquidated Claims Estimation Motion

## Exhibit G - Executory Contracts Claims

Motors Liquidation Company, et al.

Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
NAPLETON INVESTMENT PARTNERSHIP LP 406 NORTH MONROE  HINSDALE, IL 60521	14516	Motors Liquidation Company	\$967,757.56	Partially Unliquidated claims	<i>Remaining Claim</i>
NAVISTAR INC C/O MICHAEL K MCCRORY BARNES & THORNBURG LLP 11 S MERIDIAN STREET INDIANAPOLIS, IN 46204	45841	Motors Liquidation Company	\$2,284,918.57	Partially Unliquidated claims	<i>Remaining Claim</i>
NEW UNITED MOTOR MANUFACTURING INC KIRKLAND & ELLIS LLP C/O RICHARD M. CIERI 601 LEXINGTON AVENUE NEW YORK, NY 10022	67357	Motors Liquidation Company	\$500,000,000.00	Partially Unliquidated claims	<i>Under Objection</i>
NIJECT SERVICES COMPANY C/O HEATHER L FORAN ESQ ASSOCIATE GENERAL COUNSEL - LITIGATION INGERSOLL - RAND 100 CENTENNIAL AVENUE PISCATAWAY, NJ 08854	70287	Motors Liquidation Company	\$2,150,408.87	Partially Unliquidated claims	<i>Remaining Claim</i>
OTS SIGNS LP C/O HERRICK FEINSTEIN LLP ATTN GLORIA HUANG 2 PARK AVENUE NEW YORK, NY 10016	23262	Motors Liquidation Company	\$5,389,092.60	Partially Unliquidated claims	<i>Remaining Claim</i>
PLETCHER RODNEY C 1001 W PIKE ST  GOSHEN, IN 46526	50140	Motors Liquidation Company	\$101,187.68	Partially Unliquidated claims	<i>Remaining Claim</i>
SCG CAPITAL CORPORATION ATTN CYNTHIA DWELLE ESQ 74 WEST PARK PLACE STAMFORD, CT 06901	66745	Motors Liquidation Company	\$390,290.24	Partially Unliquidated claims	<i>Remaining Claim</i>
SOUTH TROY TECH LLC MICHAEL S LEIB (P30470) MADDIN, HAUSER, WARTELL, ROTH & HELLER PC 28400 NORTHWESTERN HWY 3RD FL SOUTHFIELD, MI 48034	31318	Motors Liquidation Company	\$1,429,523.44	Partially Unliquidated claims	<i>Remaining Claim</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Partially Unliquidated Claims Estimation Motion

## Exhibit G - Executory Contracts Claims

Motors Liquidation Company, et al.

Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
SUN MICROSYSTEMS INC C/O LAWRENCE SCHWAB/THOMAS GAA BIALSON, BERGEN & SCHWAB 2600 EL CAMINO REAL STE 300 PALO ALTO, CA 94306	67363	Motors Liquidation Company	\$338,240.00	Partially Unliquidated claims	<i>Remaining Claim</i>
SUPER SIGN COMPANY HERRICK FEINSTEIN LLP ATTN GLORIA HUANG 2 PARK AVE NEW YORK, NY 10016	23259	Motors Liquidation Company	\$2,407,896.60	Partially Unliquidated claims	<i>Remaining Claim</i>
SUSAN R RAINES C/O GREGORY P CAFOUROS, KROGER, GARDIS & REGAS, LLP 111 MONUMENT CIRCLE, SUITE 900 INDIANAPOLIS, IN 46204 UNITED STATES OF AMERICA	51135	Motors Liquidation Company	\$49,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
TOYOTA MOTOR CORPORATION ATTN: TMC-LEGAL NO.1 TOYOTA-CHO, TOYOTA CITY, AICHI PREFECTURE, 471-8571 JAPAN JAPAN	69721	Motors Liquidation Company	\$3,200,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
TRACY L BARLOW C/O GREGORY P CAFOUROS KROGER GARDIS & REGAS LLP 111 MONUMENT CIR STE 900 INDIANAPOLIS, IN 46204	49482	Motors Liquidation Company	\$2,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
TRUSTEES OF THE SCREEN ACTORS GUILD- PRODUCER PENSION & HEALTH PLANS 3601 WEST OLIVE AVENUE BURBANK, CA 91510	1039	Motors Liquidation Company	\$210,650.64	Partially Unliquidated claims	<i>Remaining Claim</i>
UBS AG STEPHEN A THATCHER DIRECTOR & COUNSEL UBS AG 677 WASHINGTON BLVD 8TH FLOOR STAMFORD, CT 06901 UNITED STATES OF AMERICA	44296	Motors Liquidation Company	\$22,240,478.53	Partially Unliquidated claims	<i>Remaining Claim</i>

Partially Unliquidated Claims Estimation Motion

**Exhibit G - Executory Contracts Claims**Motors Liquidation Company, et al.

Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
US BANK NATIONAL ASSOCIATION AS OWNER TRUSTEE F/B/O BODMAN LLP C/O MARC M BAKST ESQ 1901 ST ANTOINE STREET 6TH FLOOR AT FORD FIELD DETROIT, MI 48228	59208	Motors Liquidation Company	\$49,325,839.26	Partially Unliquidated claims	<i>Remaining Claim</i>
WACHOVIA BANK, NATIONAL ASSOCIATION C/O RUSKIN MOSCOU FALTISCEK PC 1425 RXR PLAZA UNIONDALE, NY 11556	29239	Motors Liquidation Company	\$37,449,061.32	Partially Unliquidated claims	<i>Remaining Claim</i>
WATKINS TRUCKS, INC ATTN. GEORGE WATKINS, PRESIDENT 4031 NEW CASTLE AVEUNE NEW CASTLE, DE 19720	21852	Motors Liquidation Company	\$607,563.19	Partially Unliquidated claims	<i>Remaining Claim</i>
WATKINS TRUCKS, INC. ATTN. GEORGE WATKINS, PRESIDENT 4031 NEW CASTLE AVENUE NEW CASTLE, DE 19720	70388	Motors Liquidation Company	\$607,563.19	Partially Unliquidated claims	<i>Remaining Claim</i>

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**EXHIBIT H**

**OTHER CLAIMS**

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
ANTHONY GOMEZ CINDY OR ANTHONY GOMEZ 101 N DOWLING RD STE A COLLEGE STATION, TX 77845	61547	Motors Liquidation Company	\$5,656.75	Partially Unliquidated claims	<i>Under Objection</i>
ARNO BUTZ ADOLFSTR 9 42655 SOLINGEN GERMANY GERMANY	69704	Motors Liquidation Company	\$83,128.30	Partially Unliquidated claims	<i>Remaining Claim</i>
ARTHUR M FITZPATRICK 4246 HIGHLAND DRIVE CARLSBAD, CA 92008	957	Motors Liquidation Company	\$6,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
ASSET ENGINEERING CORPORATION ASSIGNEE OF VANNATTER GROUP INC 8 STEELCASE ROAD WEST MARKHAM, CANADA CANADA	17210	Motors Liquidation Company	\$1,230,909.40	Partially Unliquidated claims	<i>Under Objection</i>
BAKER & MCKENZIE BAKER & MCKENZIE LLP ATTN IRA A REID ESQ 1114 AVENUE OF THE AMERICAS NEW YORK, NY 10036	67356	Motors Liquidation Company	\$145,027.30	Partially Unliquidated claims	<i>Remaining Claim</i>
BARNES & THORNBURG LLP C/O WENDY D BREWER ESQ 11 S MERIDIAN ST INDIANAPOLIS, IN 46204	7527	Motors Liquidation Company	\$3,762.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BARTLETT PROPERTY MANAGEMENT ATTN: CORPORATE OFFICER/AUTHORIZED AGENT 2017 30TH ST BEDFORD, IN 47421	23666	Motors Liquidation Company	\$15,954.45	Partially Unliquidated claims	<i>Remaining Claim</i>
BGE PO BOX 1475 BALTIMORE, MD 21201	1455	Motors Liquidation Company	\$50,143.41	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
BOHLER-UDDEHOLM 2595 MEADOWVALE BLVD MISSISSAUGA ON L5N 7Y3 CANADA CANADA	16815	Motors Liquidation Company	\$27,092.07	Partially Unliquidated claims	<i>Remaining Claim</i>
BOOTH OIL SITE ADMINISTRATIVE FUND SET A DAVIS ESQ ELIAS GROUP LLP 411 THEODORE FREMD AVE SUITE 102 RYE, NY 10580	58995	Motors Liquidation Company	\$6,940.43	Partially Unliquidated claims	<i>Remaining Claim</i>
BRIGETTE CARTER BRIGETTE CARTER 18267 LAUDER DETROIT, MI 48235	44231	Motors Liquidation Company	\$96,000.00	Partially Unliquidated claims	<i>Under Objection</i>
BRYANT JR, JAMES O 6 LAWRENCE DR APT B  BROWNS MILLS, NJ 08015	4171	Motors Liquidation Company	\$25,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
BSH PRAZISIONS-STAHLEHRHANDEL GMBH POSTFACH 17 02 26 42621 SOLINGEN GERMANY GERMANY	69705	Motors Liquidation Company	\$42,462.00	Partially Unliquidated claims	<i>Remaining Claim</i>
CHAD NEEDHAM 907 CHESTNUT ST  HICO, TX 76457	70124	Motors Liquidation Company	\$5,790.28	Partially Unliquidated claims	<i>Under Objection</i>
CONTITECH MGW GMBH ACCOUNTS DEPT A FRANZISKA HEUER, KASSELER STRABE 11 POSTFACH 1420 D 34334 HANN MUNDEN GERMANY GERMANY	17712	Motors Liquidation Company	\$92,779.47	Partially Unliquidated claims	<i>Remaining Claim</i>
CONTITECH MGW GMBH A FRANZISKA HEUER D-34346 HANN MUNDEN POSTFACH 1420 D 34334 HANN MUNDEN GERMANY GERMANY	17711	Motors Liquidation Company	\$31,287.06	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
FAST TEK GROUP LLC 9850 E 30TH ST  INDIANAPOLIS, IN 46229	21249	Motors Liquidation Company	\$70,000.00	Partially Unliquidated claims	<i>Under Objection</i>
FINDLAY INDUSTRIES ESPANA SL CARRETERA DE CAPELLADES A MARTORELL KM 17,3, 08783 MASQUEFA, BARCELONA, SPAIN SPAIN	63537	Motors Liquidation Company	\$120,953.88	Partially Unliquidated claims	<i>Under Objection</i>
FLEXTRONICS AUTOMOTIVE INC LAWRENCE SCHWAB / THOMAS GAA BIALSON BERGEN & SCHWAB 2600 EL CAMINO REAL STE 300 PALO ALTO, CA 94306	58904	MLCS, LLC	\$898,388.04	Partially Unliquidated claims	<i>Remaining Claim</i>
FLEXTRONICS CORPORATION (F/K/A SOLECTRON CORP) LAWRENCE SCHWAB / THOMAS GAA BIALSON BERGEN & SCHWAB 2600 EL CAMINO REAL STE 300 PALO ALTO, CA 94306	58902	MLC of Harlem, Inc.	\$898,388.04	Partially Unliquidated claims	<i>Remaining Claim</i>
FLEXTRONICS CORPORATION (F/K/A SOLECTRON CORP) LAWRENCE SCHWAB / THOMAS GAA BIALSON BERGEN & SCHWAB 2600 EL CAMINO REAL STE 300 PALO ALTO, CA 94306	58903	MLCS Distribution Corporation	\$898,388.04	Partially Unliquidated claims	<i>Remaining Claim</i>
FLEXTRONICS INTERNATIONAL LTD ATTN: LAWRENCE SCHWAB/THOMAS GAA BIALSON BERGEN & SCHWAB 2600 EL CAMINO REAL STE 300 PALO ALTO, CA 94306	59687	MLCS, LLC	\$898,388.04	Partially Unliquidated claims	<i>Remaining Claim</i>
FLEXTRONICS INTERNATIONAL LTD ATTN LAWRENCE SCHWAB/THOMAS GAA C/O BIALSON BERGEN & SCHWAB 2600 EL CAMINO REAL STE 300 PALO ALTO, CA 94306 UNITED STATES OF AMERICA	59693	Motors Liquidation Company	\$898,388.04	Partially Unliquidated claims	<i>Remaining Claim</i>
FLEXTRONICS INTERNATIONAL LTD ATTN LAWRENCE SCHWAB/THOMAS GAA C/O BIALSON BERGEN & SCHWAB 2600 EL CAMINO REAL STE 300 PALO ALTO, CA 94306 UNITED STATES OF AMERICA	59694	MLC of Harlem, Inc.	\$898,388.04	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
GARCIA & VILLARREAL LLP 4401 N MCCOLL RD  MCALLEN, TX 78504	36220	Motors Liquidation Company	\$661,095.10	Partially Unliquidated claims	<i>Under Objection</i>
HADDON, JAMES P 9217 SHERIDAN RD  GAINES, MI 48436	2448	Motors Liquidation Company	\$1,327.94	Partially Unliquidated claims	<i>Remaining Claim</i>
INSTATUNE HUSKY 5520 CALGARY TRAIL NW EDMONTON AB T6H 4K1 CANADA CANADA	16101	Motors Liquidation Company	\$102.14	Partially Unliquidated claims	<i>Under Objection</i>
JOHANN HAY GMBH & CO KG KENNETH M LEWIS ESQ LEWIS LAW PLLC 120 BLOOMINGDALE ROAD, STE 100 WHITE PLAINS, NY 10605	66748	Motors Liquidation Company	\$81,916.65	Partially Unliquidated claims	<i>Under Objection</i>
JOHN N GRAHAM TRUSTEE C/O THOMAS J SCHANK HUNTER & SCHANK CO LPA 1700 CANTON AVE TOLEDO, OH 43604	30485	Motors Liquidation Company	\$1,443,145.70	Partially Unliquidated claims	<i>Under Objection</i>
JOHN N GRAHAM TRUSTEE THOMAS J SCHANK HUNTER & SCHANK CO LPA 1700 CANTON AVE TOLEDO, OH 43604	30487	MLCS, LLC	\$218,934.83	Partially Unliquidated claims	<i>Under Objection</i>
KPMG LLP 58 CLARENDON RD DEPT 791 WD17 1DE WATFORD UNITED KINGDOM GREAT BRITAIN GREAT BRITAIN	12916	Motors Liquidation Company	\$97,170.00	Partially Unliquidated claims	<i>Under Objection</i>
KUKA ROBOTS IBERICA S A C/O BRYAN CERMAK KUKA GROUP LEGAL DEPT 22500 KEY DRIVE CLINTON TOWNSHIP, MI 48036	46617	Motors Liquidation Company	\$101,790.97	Partially Unliquidated claims	<i>Under Objection</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
LORAMENDI S COOP ALIBARRA 26 VITORIA SPAIN 01010 SPAIN	24306	Motors Liquidation Company	\$8,789.63	Partially Unliquidated claims	<i>Remaining Claim</i>
MARANGOS, DIMITRIOS S 3162 GLENGROVE DR ROCHESTER HILLS, MI 48309	61381	Motors Liquidation Company	\$20,000,000.00	Partially Unliquidated claims	<i>Under Objection</i>
MEOLDY A MCGINNESS RONALD MCGINNESS JR 114 BROOKS AVE BAYVILLE, NJ 08721	69530	Motors Liquidation Company	\$5,700.00	Partially Unliquidated claims	<i>Remaining Claim</i>
MERIDIAN LIGHTWEIGHT TECHNOLOGIES INC ATTN: ALAN J MILLER 25 MCNAB AVE STRATHROY ONTARIO N7G 4H6 CANADA CANADA	69193	Motors Liquidation Company	\$4,995.76	Partially Unliquidated claims	<i>Under Objection</i>
MR KIRBY N PRIDDY PO BOX 151 OOLITIC, IN 47451	69715	Motors Liquidation Company	\$21,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NATIONAL FIRE INSURANCE COMPANY OF HARTFORD CNA SURETY 333 S WABASH AVE 41ST FLOOR CHICAGO, IL 60604	510	Motors Liquidation Company	\$1,000,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NEW JERSEY SELF INSURERS GUARANTY ASSOCIATION C/O MCCARTER & ENGLISH, LLP ATTN: CHARLES A. STANZIALE, JR. FOUR GATEWAY CENTER, 100 MULBERRY STREET NEWARK, NJ 07102	59735	Motors Liquidation Company	\$7,500,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NIDEC MOTORS & ACUATORS C/O DAVID M. EISENBERG ERMAN, TEICHER, MILLER, ZUCKER & FREEDMAN, P C 400 GALLERIA OFFICENTRE, SUITE 444 SOUTHFIELD, MI 48034	64889	MLCS, LLC	\$100,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
NIDEC MOTORS & ACUATORS C/O DAVID M EISENBERG ERMAN TEICHER MILLER ZUCKER & FREEDMAN PC 400 GALLERIA OFFICENTRE SUITE 444 SOUTHFIELD, MI 48034	64890	Motors Liquidation Company	\$100,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NIDEC MOTORS & ACUATORS C/O DAVID M EISENBERG ERMAN TEICHER MILLER ZUCKER & FREEDMAN PC 400 GALLERIA OFFICENTRE SUITE 444 SOUTHFIELD, MI 48034	64891	MLCS Distribution Corporation	\$100,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
NIDEC MOTORS & ACUATORS C/O DAVID M EISENBERG ERMAN TEICHER MILLER ZUCKER & FREEDMAN PC 400 GALLERIA OFFICENTRE SUITE 444 SOUTHFIELD, MI 48034	64892	MLC of Harlem, Inc.	\$100,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
OLIVER BRAUN AUSTR 14 96047 BAMBERG GERMANY GERMANY	68748	Motors Liquidation Company	\$5,661.60	Partially Unliquidated claims	<i>Under Objection</i>
ROLF PETERS REUßSTR 1 38640 GOSLAR GERMANY GERMANY	69320	Motors Liquidation Company	\$14,154.00	Partially Unliquidated claims	<i>Under Objection</i>
SHIGA INTERNATIONAL PATENT OFFICE MASATAKE SHIGA PRESIDENT GRAN TOKYO SOUTH TOWER 1-9-2 MARUNOUCHI CHIYODA KU TOKYO JAPAN 100-6620 JAPAN	1153	Motors Liquidation Company	\$4,198.39	Partially Unliquidated claims	<i>Under Objection</i>
SIKORA GMBH RUHLSDORFER STR 95 HAUS 81 STAHNSDORF BB 14532 GERMANY GERMANY	23134	Motors Liquidation Company	\$11,437.85	Partially Unliquidated claims	<i>Remaining Claim</i>
TERJE SØRHAUG HAAKONSVEGEN 24 B 5519 HAUGESUND NORWAY NORWAY	70280	Motors Liquidation Company	\$92,779.47	Partially Unliquidated claims	<i>Under Objection</i>

(1) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Partially Unliquidated Claims Estimation Motion

Motors Liquidation Company, et al.  
Case No. 09-50026 (REG), Jointly Administered

Name and Address of Claimant	Claim #	Debtor	Liquidated Claim Amount for Reserve Purposes	Reserve Type	Objection Status
TOYOTA MOTOR SALES U S A INC ATTN TOBIN LIPPERT ESQ 19001 SOUTH WESTERN AVE HQ12 TORRANCE, CA 90509	20951	Motors Liquidation Company	\$119,171.27	Partially Unliquidated claims	<i>Remaining Claim</i>
US CUSTOMS AND BORDER PROTECTION ATTN REVENUE DIVISION BANKRUPTCY TEAM 6650 TELECOM DR SUITE 100 INDIANAPOLIS, IN 46278	51097	Motors Liquidation Company	\$25,066,317.08	Partially Unliquidated claims	<i>Remaining Claim</i>
VINSON & ELKINS LLP C/O CHARLES D TETRAULT THE WILLARD OFFICE BLDG 1455 PENNSYLVANIA AVE NW WASHINGTON, DC 20004	17741	Motors Liquidation Company	\$52,866.00	Partially Unliquidated claims	<i>Remaining Claim</i>
WILLIAM LOCKE 116 PARKWOODS CT NOBLE, OK 73068	16386	Motors Liquidation Company	\$10,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>
WORKERS COMPENSATION COURT OF OKLAHOMA KEVIN BLANEY PC PO BOX 657 OKLAHOMA CITY, OK 73101	65859	Motors Liquidation Company	\$1,726,000.00	Partially Unliquidated claims	<i>Remaining Claim</i>

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